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Initial Solids Removal Plan

Rico-Argentine Mine Site – Rico Tunnels Operable Unit OU01 Rico, Colorado

Atlantic Richfield Company

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July 7, 2011

Mr. Steven Way
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US EPA Region 8
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Subject: Initial Solids Removal Plan

Rico-Argentine Mine Site – Rico Tunnels Operable Unit OU01 Rico, Colorado

Dear Mr. Way,

Please find enclosed three (3) copies of the revised *Iritial Solids Removal Plan*, including a memorandum with responses to specific comments as Appendix E, both dated June 30, 2011; in addition, an electronic copy of the combined documents in PDF file format is being submitted via email. Atlantic Richfield is submitting the revised document and response to comments pursuant to comments received from EPA by email dated May 27, 2011, and in accordance with the Removal Action Work Plan, Rico Project – Rico Soils and St. Louis Ponds Rico, Colorado dated March 9, 2011.

If you have any questions, please feel free to contact me at 406.491.1129.

Sincerely,

Chuck Stilwell, P.E.

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Project Manager

Atlantic Richfield Company

Enclosures

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1.0 Introduction

1.1 Purpose

This Initial Solids Removal Plan (Plan) addresses the overall removal and drying of solids from all of the upper ponds at Operable Unit OU01 of the Rico-Argentine Mine Site – St. Louis Tunnel (Site) responsive to the requirements of Section 5.2.1 of the Removal Action Work Plan, Rico-Argentine Mine Site – Rico Tunnels, Operable Unit OU01 Rico, Colorado dated March 9, 2011 (see Figure 1 for Site location). As described below, this Plan focuses on the near-term removal of solids at Pond 18 and construction and operation of an interim drying facility. This initial removal and interim drying of existing solids from Pond 18 will also provide field-scale data to evaluate the best means and methods for removal and drying of existing solids from the remaining upper ponds and also for management of fiture lime solids that are expected to be generated as part of the future water treatment system. A general plan and schedule for all initial solids removal is provided, but will be refined upon evaluation of the Pond 18 solids removal. This initial solids removal will result in the majority of existing pond solids being moved from the active settling ponds of the treatment system, and ultimately being placed in a secure on-site repository.

1.2 Scope

A substantial portion of the existing precipitation solids and sediments (hereinafter typically referred to as solids) in the upper ponds (Ponds 18, 15, 14, 13, 12 and 11 – from north to south) will be removed, dried, and eventually disposed of in a fiture on-site repository. The solids removal will begin in the summer of 2011 at Pond 18 and placement of solids in an on-site solids repository will be completed no later than December 2014 as described more fully in Section 5.0 below. An overall plan of the portion of the ponds system encompassing the upper ponds is shown in Figure 2.

The currently envisioned means and methods of removal and interim drying of Pond 18 solids are described in this Plan. The specific detailed methods utilized will be determined in the field based on: current site conditions in Pond 18 and at the interim drying facility site; weather conditions during the removal and interim drying period (precipitation, evaporation and wind); performance of the equipment used for removal of sediments; and the performance of the interim drying facility.

An interim drying facility will be constructed in summer 2011 to allow drying and storage of the portion of the existing solids to be removed from Pond 18, pending construction of the plarmed on-site solids repository. The solids in the remaining upper ponds will be processed in the interim drying facility, or a permanent drying facility to be constructed together with the solids repository, depending on when they are removed.

The interim drying facility will be constructed with up to four (4) separate cells to facilitate full-scale testing of alternative drying methods and also provide information valuable to designing a permanent drying facility and establishing operational procedures. Data will be collected and observations documented for the major elements of the removal and interim drying processes during the initial Pond 18 solids removal. The method of solids removal and drying will be modified for subsequent solids removal, as informed by the field experience gained during the Pond 18 removal this summer.

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1.3 Precipitation Solids Inventory

Precipitation solids have accumulated in the upper ponds (Ponds 11-15 and 18) at the Site as a result of precipitation and setthing of metal complexes by natural processes and by prior addition of lime to the St. Louis Tunnel discharge from approximately 1984 to 1995. It is also possible that some amount of sediment eroded from the floor of the underground workings in the St. Louis Tunnel and/or from the bed and walls of the open charmel outside the tunnel have been conveyed by the St. Louis Tunnel discharges to Pond 18 and possibly to the other upper ponds.

An inventory of existing solids was performed in 2001¹ by precision surveying utilizing a sampling boat outfitted with a survey prism and depth sounding rods. The estimated volume of solids as of the time of the 2001 surveys in each of the upper ponds investigated is summarized as follows:

- Pond 18 20,000 cubic yards (see discussion below regarding current estimated volume)
- Pond 15 11,000 cubic yards (see discussion below regarding calcine tailings beneath solids)
- Pond 14 2,600 cubic yards
- Pond 13 not inventoried (see discussion below with estimate of current solids volume)
- Ponds 11 and 12 10,600 cubic yards

A total in-place volume of 44,200 cubic yards (cy) of solids was estimated from the 2001 surveys and probing (not including material in Pond 13 or calcine tailings found at the bottom of Pond 15, and prior to the initial in-pond dewatering of solids in Pond 18, as discussed below).

Following the original survey of sediment volumes in 2001, water was re-routed around Pond 18 for a period of 10 months to allow the pond solids to dewater (as discussed in Section 1.4 below) and the solids were observed to consohdate in place. Also, a small volume of solids was removed for use in the pilot scale test cells in Ponds 16/17 in 2002. Water was again rerouted around Pond 18 in late fall 2010 and has continued to bypass the pond to present (approximately 7 months to date). Based on a recent survey of the surface of the solids in Pond 18 performed in April 2011 and the original pond bottom probing performed in 2001, it is estimated that Pond 18 currently contains approximately 13,000 cubic yards of solids (see additional discussion in Section 1.4 below).

Sampling of the fill section of material in Pond 15 during the 2001 investigation revealed that the total volume of material in the pond was approximately 19,000 cy, of which approximately 40-45 percent (or about 8,000 cy) was calcine tailings underlying the precipitation solids. There was also an indication of a minor amount of calcine tailings at the bottom of Pond 18, but not enough to merit separate accounting.

¹ Unpublished file information prepared by SEH, Inc.

The exposed surface of the material in the periodically unsubmerged portion of off-line Pond 13 appears to be comprised of precipitation solids. The nature of the materials at depth in Pond 13 is unknown. Review of boring and test pit logs in the dikes surrounding the pond indicates that the earthfill is locally mixed with some calcine tailings. This suggests the possibility that some portion of the materials below the solids exposed at the surface in Pond 13 may be calcine tailings, as was found in prior sampling in Pond 15. Given the very soft condition of the exposed near-surface materials and the very shallow water depth on the submerged portion of the pond during the 2001 surveys, Pond 13 could not be safely accessed for depth measurement or sampling. In the absence of survey/probe data, the order of magnitude volume of material in Pond 13 has been estimated as 20,000 cy based on topographic spot elevations in the unsubmerged portion of the pond from a pre-1995 topographic map of the Site and an estimate of the elevation of the pond bottom extrapolated from data in the adjacent probed ponds.

Relatively few settled solids were observed below Pond 11 and those ponds are not included in the removal, drying and repository storage plans for the Site.

Based on prior site geologic and geotechnical investigations (see geologic map and sections in Appendix A and boring and test pit logs in Appendix B), it is inferred that the bottom of Pond 18 was excavated into underlying predominantly coarse-grained (sand, gravel and cobble) alluvial aquifer deposits. Measurements of water levels in monitoring wells adjacent to Pond 18, as supported by readings in temporary piezometers installed in 2001-2002, indicate that the depth to groundwater within the pond solids has varied from the top surface to near the bottom of the pond solids reflecting a range of seasonal and climatic (drought versus wet period) conditions. Recent measurements over the past 10 months of the nearest monitoring wells indicate that groundwater levels were highest in July and lowest in December-March. The highest groundwater levels project to about two (2) to three (3) feet above the average bottom elevation of solids in Pond 18, and the lowest levels project to the approximate average bottom elevation of solids in Pond 18.

1.4 Pond 18 Solids Characteristics

Paser (1996)² recovered piston-style core samples of the solids from Pond 18, which at that time were approximately 8 feet thick. Subsequent detailed grid probing in 2001 indicated an average sediment thickness of 10.5 feet.

Based on previous testing in 2002³ of minimally disturbed core samples from Ponds 11, 12, 14, 15 and 18 acquired in 2001, the settled precipitation solids (prior to any in-pond consolidation by dewatering during low groundwater periods) are estimated to have a weighted average solids content (weight of dry solids/total wet weight) of 12.9 percent and an average particle specific gravity of 2.42. Following a planned dewatering exercise from September 2001 to June 2002, which included a winter groundwater level at or below the base of Pond 18, the average bulk unit weight of the solids was estimated at 23 pcf Based on a recent survey of the top of solids in Pond 18 made in April 2011 and the 2001 pond bottom contours, it is estimated that there are approximately 13,000 cubic yards of solids in

³ Unpublished file information prepared by SEH, Inc.

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² Paser, Kathleen S. 1996. Characterization of and Treatment Recommendations for the St. Louis Adit Drainage and Associated Settling Ponds in Rico, Colorado: MS Thesis, Colorado School of Mines. August 30.

Pond 18, and that the average thickness of the solids is on the order of four (4) to five (5) feet.

Permeability testing of the solids has not been performed due to the significant physical access challenges and safety concerns of working on water over the solids or accessing equipment directly on the very soft solids surface where unsubmerged. Estimates of vertical permeability of the in situ solids in Pond 18 as of 2002 based on column testing of solids sampled from the pond were on the order of 8×10^{-5} cm/sec for the modeled pre-dewatering case and 3×10^{-5} cm/sec for the in-pond consolidation model. These estimated vertical permeabilities of undisturbed solids appear generally consistent with the bulk unit weight and fine-grained nature of the solids. Given the approximately seven (7) additional months that water has recently been routed around Pond 18, it is possible that some additional consolidation and settlement has occurred, and that the current vertical permeability may be somewhat lower.

These laboratory-scale estimates have also been compared to an estimate made by proportioning the total previously estimated seepage from all active ponds from Pond 18 through Pond 5 (estimated by a mass balance calculation of surface flows and evaporation as approximately 250 gpm or 0.56 cfs) to each pond based on its bottom area. On this basis, the back-calculated overall average vertical permeability (K_v) for the Pond 18 solids would be on the order of 1 x 10⁻⁵ cm/sec. Given that this mass-balance derived estimate includes the lower Ponds 9 through 5 with little to no visible solids, it is not unreasonable to estimate that the actual average vertical permeability of the Pond 18 solids on this basis would be somewhat lower.

2.0 Solids Removal

Two primary alternatives will be evaluated and tested in the field to arrive at one or more acceptable procedures to remove and transport solids from Pond 18 to the interim drying facility. The informadon gathered during the Pond 18 removal in the summer of 2011 will serve as the initial basis for selection of the removal method(s) for the other upper ponds during 2012-2013, with any appropriate modifications in the chosen method to reflect specific conditions that are encountered during the actual removal.

The first alternative is use of conventional earthmoving equipment, which is believed most suitable for solids to be excavated above the groundwater table at the time of removal based on pilot scale investigations conducted in 2001-2002. This alternative will involve the following steps:

- 1) Route incoming flow around Pond 18 to the next downgradient pond in the flow path (Pond 15) (this step was completed in fall 2010).
- 2) Decant and pump off remaining surface water from Pond 18 to allow additional solids consolidation in-place for as long as the overall construction schedule would allow (completed in fall 2010); pump snowmelt and precipitation accumulated since fall 2010 to Pond 15 prior to commencing removal in 2011.
- 3) Excavate solids with conventional earthmoving equipment, likely including a low ground pressure tracked excavator with extended boom reach and possibly a

mbber tire or tracked loader; swamp pads and/or earthen causeways may be required to access and facilitate controlled removal of solids.

- 4) Haul solids by tmck and/or loader to the interim drying facility.
- 5) Deposit and spread solids in drying cells at the interim drying facility, using a small dozer and possibly a small conventional loader and/or skid-steer loader.

It is proposed to leave approximately two (2) feet of solids relatively undisturbed in the bottom of Pond 18 to limit seepage loss to the underlying predominantly coarse-grained alluvial aquifer. Based on the informadon from the 2001 investigation described previously and recent survey of the current top of the solids, it is estimated that approximately 5,000 cy of the 13,000 cy in Pond 18 will be left in place. Special care will be taken by means and methods to be determined in the field to minimize to the extent practical over-excavation of the solids to remain in place.

Secondly, a dredging alternative will be evaluated. This alternative would involve:

- 1) Perform a limited pilot test of removing un-dewatered solids from Pond 15 using a floating suction dredge.
- 2) Take measures to limit any additional solids being moved from Pond 15 to the lower ponds during the test including, but not necessarily limited to: a. the test will be performed on the upper portion of the pond to allow solids suspended in the water column opportunity to settle out within the pond; b. the Pond 15 outlet will be blocked or re-routed (possibly to Pond 13) during the test; c. water quality samples will be taken at the ponds system discharge point to the river; and d. the test will be of a relafively short duration.
- 2) Dredge solids with a suction dredge with an appropriately designed, continuously agitating suction head to counteract the apparent thixotropic-like behaviour (i.e., tendency for solids to behave as a solid versus as a slurry in the absence of constant agitation) observed during the 2001-2002 pilot scale dewatering and removal exercise at Pond 18;
- 3) Convey solids via pipeline to a separate cell, sub-cell, or tank in the interim drying facility, which will not be mixed with solids removed from Pond 18 so as not to compromise the drying of Pond 18 solids.
- 4) If necessary, excess water removed to the interim drying area during the test can be decanted, or actively pumped, back to Pond 15 or Pond 13 once initial solids settling has occurred.

As necessary to develop and prove the feasibility of the dredging alternative, a dredging contractor may be engaged to perform field-scale trial removal from Pond 18, but only after more consolidated, dried solids have already been removed with conventional equipment. This will be dependent on the amount and water-content of remaining solids in Pond 18. This option will be considered after significant solids removal in Pond 18 has occurred, and the viability of removing additional solids with a dredge has been assessed in the field. As in the case of the conventional excavation method, approximately two (2) feet of sediment will be left in the bottom of Pond 18. Again, special care will be exercised to develop a means to ensure that disturbance of the solids to remain is minimized to maintain their lining effect.

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3.0 Interim Drying Facility

3.1 Siting

The available open ground in the former Ponds 16/17 area is planned to be used for the interim drying of solids removed from Pond 18 as shown on Figure 2. This location is strongly preferred considering:

- Close proximity to Pond 18 and the other upper ponds containing the majority of the solids to be processed limits transport distances.
- Existing accessibility to both conventional equipment for cell construction and solids placement and piping for dredge discharge;
- Surface grade is above the seasonal high groundwater level so that downward drainage of the placed wet solids will not be impeded by underlying groundwater;
- Sufficient gently sloping ground is present for placement of Pond 18 solids in a relatively thin layer to promote more efficient drainage and consolidation;
- Existing ground generally slopes in an advantageous direction to promote drainage of dewatering water along the base of the placed solids while minimizing the cut/fill; and
- Available grade is present for gravity conveyance of dewatered pore water from the consolidating solids to Pond 15 in the active ponds system.

Use of this interim facility for drying of solids removed from Ponds 11 through 15 during 2012-2013 will be considered depending on the performance observed during 2011 and on later decisions regarding the layout and design of the ponds treatment system and solids repository. The potential to convert an interim drying facility at this location to a permanent facility is also considered feasible based on information and evaluations to date.

Alternative locations for the interim drying facility were considered, but determined less feasible than the Ponds 16/17 area. These locations include the relatively open flat area north of Pond 18 and the currently off-line Pond 13. Disadvantages of the north area site as compared to the Ponds 16/17 site include: 1) having to transport removed solids considerably further and upslope by about 6-18 feet of elevation more; 2) the need to completely encircle the site with a containment dike; and 3) significantly more grading of the subgrade to promote gravity drainage of non-infiltrating dewatering water to a down-gradient sump. The Pond 13 alternative site is seasonally submerged by an estimated one (1) to two (2) feet of water and was therefore not considered further. If necessary based on later decisions regarding the layout and design of the ponds treatment system primary settling pond and the solids repository, one or both of these sites could be further considered during siting and design of the permanent drying facility.

3.2 Site Geologic and Groundwater Conceptual Model

The conceptual geologic model of the preferred site for the interim drying facility is illustrated in plan and sections on figures in Appendix A. The immediate site consists nearly

entirely of calcine tailings overlying alluvium of the Dolores River valley. A thin veneer (ranging from less than a foot to up to about two feet) of mixed fill, mine waste and debris is locally present at the surface of portions of the Ponds 16/17 area. The eastern side of the site locally overlies the toe of the waste rock pile placed during construction of and subsequent mining in the St. Louis Turnel and cross-cuts. The western limit of the site area abuts embankment fill over alluvium retaining Ponds 18 and 15 to the west; the southern site boundary lies along the embankment separating Ponds 16/17 from Pond 13 (that in turn overlies alluvium); and the site is bounded on the north by mixed fill, mine waste and debris overlying alluvium.

Groundwater is present in the alluvium beneath the site areas at depths on the order of five (5) to 10 feet based on the groundwater level data shown on the sections in Appendix A. Note that although the available groundwater data spans a very substantial period of time (nearly 30 years), the groundwater levels inferred from the data appear remarkably consistent and reasonable. Based on the available data, the gradient of flow in the groundwater has a component from north to south (as would be expected following the downstream slope of the shallow alluvial aquifer along the Dolores River), and also a component from east to west (consistent with groundwater discharging from CHC Hill/Telescope Mountain) toward the Dolores River). The deeper calcine tailings in the southern portion of the proposed interim drying facility footprint lie on the order of five (5) to seven (7) feet below the estimated average groundwater table.

3.3 Calcine Tailings

The preferred location for the interim drying facility in the area of the now dry Ponds 16/17 overlies *calcine tailings* placed during past ore processing activities on site. The process leading to the formation of the calcine tailings and what is currently known about their physical and chemical characteristics is summarized in the following paragraphs.

Formation of Calcine Tailings. Calcine tailings are formed as a byproduct of roasting of pyrite ores. Roasting is "the process of heating metallic sulfide ores in air to convert sulfides to oxides", typically used to create sulfuric acid. Technically, calcination is different from roasting because calcination denotes thermal decomposition as in heating limestone to drive off carbon dioxide. Nonetheless, the solid product of both types of operations is referred to as a calcine. The so-called calcine tailings south of the St. Louis Tunnel portal at Rico are not truly tailings as would have been produced by a concentrating operation, but are simply calcine.

A plant for producing sulfuric acid from pyrite (Fe₂S) mined locally was constructed in September 1955 and the "...acid plant ran for 9 years, until a cutback in the uranium program destroyed the market for the acid." According to McKnight (1974), pyritic tailings from the lead-zinc mill were concentrated to provide feed for the first 15 months, but exhaustion of this source led to mining of massive pyrite, mostly from the mines of CHC Hill.

By the 1950s, most pyrite roasting plants used the Dorr-Oliver $Fluosolid^{\mathbb{C}}$ apparatus that used a draft fan to suspend fine particles of pyrite in an upward-flowing stream of air. Oxygen in the air reacted with pyrite at about 600 °C as follows: $2\text{FeS}_2 + 5\frac{1}{2}O_2 = \text{Fe}_2O_3 + \frac{1}{2}O_2 = \frac{1}{2}O_3 + \frac{1}{2}O_3 = \frac{1}{2}O_3 + \frac{1}{2}O_3$

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⁴ "Geology and Ore Deposits of the Rico District, Colorado", E. T. McKnight, USGS Professional Paper 723, 1974.

4SO₂. The offgas from the roaster were drawn through a settling chamber, thence through dust cyclones and a wet sembber; the mixture of wet sludge and dry particulates that were captured was *calcine*. The cleaned gases, containing about 10% SO₂, were treated in a processing unit called a contact/absorption acid plant where sulfur dioxide, SO₂, was catalytically converted to sulfur trioxide, SO₃, which was absorbed in water to create sulfuric acid, H₂SO₄. Typically, acid plants of this type produced a commercial grade of acid that contained about 93% H₂SO₄ and 7% H₂O.

Pyrite oxidizes in a roaster at a temperature too low for appreciable oxidation of the sulfides of other base metals to occur, so the calcine will typically contain chalcopyrite, galena, and sphalerite (if those minerals were present in the ore), in addition to synthetic hematite, Fc₂O₃. This is generally consistent with the analyses of mineral phases present in the Rico calcine tailings as discussed immediately below.

Physical and Chemical Characteristics of Calcine Tailings. Calcine tailings have been encountered in nine (9) test pits and seven (7) borings in the Ponds 16/17 area to date. A map and sections showing their locations are included in Appendix A and logs of these test pits and borings are presented in Appendix B. No geotechnical testing of the calcine tailings has been performed to date, but based on on-site observations and the descriptions in the logs in Appendix B they are generally described as: silty fine to very fine sand (SM); purple, maroon or red to dark red; loose to medium dense; and varying from dry to saturated depending on their location relative to the groundwater table at the site. The hydraulic conductivity of the calcine tailings has not been measured to date in the field or laboratory, but is estimated to be on the order of as high as 10^{-4} to as low as 10^{-6} cm/sec based on the above grain size description.

Selected samples of calcine tailings from borings EB-1 and EB-2 were submitted to Dr. John Drexler at the University of Colorado at Boulder for quahtative microprobe review. The samples were selected at varying depths from near surface (5-7 feet) above the water table from the middle of the deposit (10-12 feet), to the bottom of the deposit (22-24 feet) below the water table. The results of Dr. Drexler's review are presented in Appendix C. These results are summarized as follows:

- 1) Iron oxide was a predominant phase in most samples, consistent with the genesis of the calcine tailings as discussed above; pyrite was only observed in the deepest sample (22-24 feet).
- 2) Calcite is abundant in the deeper samples (below 10-12 feet).
- 3) Other minerals present to abundant include quartz, microcline (feldspar), sphalerite and galena; minor zinc and copper sulphate were observed in the two deepest samples (20-24 feet).
- 4) Gypsum is variably present in the samples; it is abundant in the two deepest samples (20-24 feet), present in minor quantities in the two shallowest samples 5-9 feet), and absent in the one mid-depth sample 10-12 feet).

The observed near neutral pH of the groundwater in the vicinity of Ponds 16/17 (see data in Appendix D) is consistent with the observation of abundant calcite in the deeper calcine

tailings samples and with previous acid neutralization testing that was performed (but for which the results have not yet been found in archival project files).

Evaluation of Potential Effects on Groundwater. Given the proposed siting of the interim solids drying facility over the calcine tailings, geochemical sampling and evaluation is proposed to assess the potential for additional release of metals due to infiltration of dewatered pore fluids from the deposited solids in the drying beds into the underlying calcine tailings, as follows:

- 1) Collect Shelby tube samples of calcine tailings from at least three (3) depth horizons at the approximate third points through the deposit; two of the samples would likely be above the water table with the third sample intentionally collected below the water table.
- 2) Collect pore fluid from treatment solids removed from Pond 18 and freshly deposited in the interim drying facility either by field extraction with a porous cup lysimeter and vacuum or by lab extraction of fluid from a bulk solids sample using a Buchner funnel.
- 3) Perform two suites of synthetic precipitation leaching procedures (SPLP) testing on the calcine tailings samples using two types of extracting fluids: a) pore fluid collected from the existing solids in Pond 18 to represent the anticipated leaching fluids from the interim drying facility; and b) Westem US SPLP leachate solution to simulate leaching through calcine tailings with infiltrating snowmelt/rainwater (the existing condition prior to constructing the interim drying facility).
- 4) If the results of previous acid-base accounting tests on the calcine tailings are not retrievable from archival records, these tests will also be performed on the samples collected under item 1) above.
- 5) Additionally, samples of the calcine tailings will be collected for pH analysis.

Given the known very low driving hydraulic head of the dewatered pore fluid in the interim drying cells and the estimated low to very low permeability of the underlying calcine tailings, it is anticipated that very little infiltration and permeation of the calcine tailings by the dewatered pore fluid will occur. However, testing is proposed to evaluate the potential for additional metals release in the event that some flux of solids dewatering pore fluid does occur through the calcine tailings. The proposed leaching procedures will be used to evaluate the change in pore fluids when the leaching fluid changes from the existing conditions to an alkahne dewatering fluid derived from the interim drying beds. Comparison of leaching with the two different fluids will indicate whether given constituents will increase, decrease, or remain the same if the leaching solution changes. The results of both leachate procedures can then also be compared with historic and ongoing monitoring of groundwater quality beneath and in the vicinity of the interim drying facility in existing and proposed new monitoring wells. The results of this proposed program of geochemical sampling and analysis will provide guidance for continued operation of the interim drying facility and for final design and operation of a permanent solids drying facility.

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3.4 Interim Drying Facility Layout

As shown on Figure 3, the combined Ponds 16/17 area will be subdivided into several cells (four shown). Each cell will have a different design and operation that will allow for evaluation of drying technologies for a permanent facility. The cells will be set back and isolated from Ponds 18, 15 and 13 with an earthen containment dike/access road. This access would be used for solids hauling/placing, and also for future repairs/upgrades if/as needed to the existing adjacent upper pond embankments. Compacted earth dikes will be used to enclose and divide the cells, which will be sized for height to accommodate the solids removed from Pond 18 (and possibly later from the other upper ponds as necessary pending construction of a permanent drying facility), with sufficient freeboard to accommodate direct precipitation (rainfall and snowmelt). Stormwater mn-on will be intercepted in a ditch/berm around the upslope limits of the drying facility and conveyed to the ponds system.

The Ponds 16/17 area generally consists of approximately one (1) foot of random rock fill over 15 to 25 feet of calcine tailings from historical pyrite ore processing activities. The rock fill and any other ruaterials or debris present in the footprint of the drying facility will be removed. The area of each cell will be graded to drain generally from northeast to southwest, to a sump that will be used to collect gravity-induced drainage from the placed solids that does not directly infiltrate the underlying calcine tailings (if any) and direct precipitation, which will in turn be conveyed by gravity or pumping to Pond 15 (see Figures 3 and 4).

3.5 Drying Cell Conceptual Design and Operation

It is expected that there will be four (4) cells in the interim drying facility, divided by earthen berms, with access by vehicles provided to each cell. The design of each cell varies to provide for evaluation of different drying cell procedures for the permanent drying facility design. The actual number, configuration and purpose of each of the proposed individual drying cells may change during the course of the Pond 18 solids removal based on the characteristics of the solids at the time they are removed. Adjustments to the initial layout, configuration and operation of the cells will be made, if/as necessary in response to ongoing evaluation of the removal and drying facility operations and perfomance. The initial four (4)-cell concept is provided on Figure 3 and its construction and operation is further described as follows:

- Drying Cell 1 would consist of a perimeter dike with bottom surface graded in the
 existing calcine tailings. Solids would be placed directly on the calcine tailings with
 no underlying placed filter or drainage media. Once placed the solids would be left
 undisturbed until the maximum practical dewatering and consolidation by
 evaporation and downward drainage had occurred.
- Drying Cell 2 would be constructed and operated consistent with Cell I, except that
 the solids would be periodically tilled to promote evaporative drying.
- Drying Cell 3 would include a perimeter dike with graded bottom surface on calcine tailings that is subsequently covered with a layer of gravel to provide a high efficiency drainage media to promote downward gravity drainage of pore water from the overlying solids into and then laterally through this highly permeable drainage layer. This concept would also test the tendency for the solids to "pipe" (internally

- erode) into the open voids in the gravel blanket. The gravel layer would be connected to the sump at the low point of the cell.
- Drying Cell 4 would be designed and operated as for Cell 3 except that a graded soil filter would be placed between the overlying solids and the underlying gravel blanket. If the filter layer acts to prevent piping of the solids into the gravel drain, but clogs in the process, then means and methods to efficiently remove and replace the filter during operation of the facility would be evaluated.

The height of the perimeter dikes will be set to minimize to the extent practical both the depth of solids to promote more rapid and efficient drying and the plan area necessary to devote to solids drying. The footprint area and slopes of the new perimeter dikes will be set based on bearing capacity and settlement considerations of the calcine tailings foundation material, as well as stability requirements based on the nature of the embankment borrow sources (whether on- or off-site) relative to stormwater, precipitation, and seepage considerations. The drainage media (gravel layer and soil filter, where placed) will be designed based on hydraulic requirements to carry the required flows, and filter criteria to mitigate piping while maintaining adequate permeability. Details of the design and construction of the interim drying cells may vary depending on whether the solids are conveyed and placed by conventional earthmoving equipment or by suction dredge and pipeline.

4.0 Evaluation of Removal Methods and Drying Cell Performance

The means and methods utilized to remove and transport solids from Pond 18 to the interim drying facility will be thoroughly documented with field notes and digital photographs and video. The volume of solids removed and the depth of solids left in place will be tracked by survey/direct measurements (if safe access can be made) and/or load counts (if removed and transported by conventional earthmoving equipment) or pipe discharge measurement (if removed by dredge and conveyed by pipe).

The purpose of the multi-cell approach to the interim drying facility is to evaluate, on a field scale, the most efficient method(s) for dewatering and consolidation of the precipitated solids, which can then be applied, as appropriate, to future solids removal from the other upper ponds and long-term management of solids generated during operation of the overall treatment system. It is anticipated that the solids drying performance of the interim drying facility will be evaluated for key parameters using a combination of the following techniques:

- Solids Drying Time: Periodic measurement of the approximate depth of sediment in the drying cells, indicative of the amount and time required for consolidation. Drying will be observed throughout the initial few months after solids are placed in the drying cells, as well as possibly in 2012 for up to a year after placement.
- Solids Physical Characteristics over Time: Recovery of Shelby tube samples of the sediment from each cell, for laboratory evaluation of moisture content, density, shear strength, hydraulic conductivity and consolidation changes over time. These parameters will be key input data for design of the permanent drying facility and solids repository.

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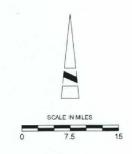
- Drying Performance of Different Cells: Excavation of test pits and observations of the gravel drain and earthen filter layers, where used, to assess potential for piping and clogging of these materials, and the resultant reduction in drainage efficiency and shear strength of the overlying solids.
- Drainage Water Characterization: Evaluation of the approximate volume and chemical characteristics of surface drainage discharged from the drying cells to Pond 15, and of potential positive or negative effects of drainage water on metals release from the underlying calcine tailings. This information will assist in understanding how to manage the dewatering water, and assist design of the future water treatment facilities.
- Dust Potential and Control Options: An ongoing assessment will also be made of the potential for dust being generated during the solids drying, and the need for control of dust from the solids. The surface of the solids in the drying cells will be treated either with a light water spray, a suitable dust suppressant, or mixed/turned over with the underlying wetter solids, if/as necessary.

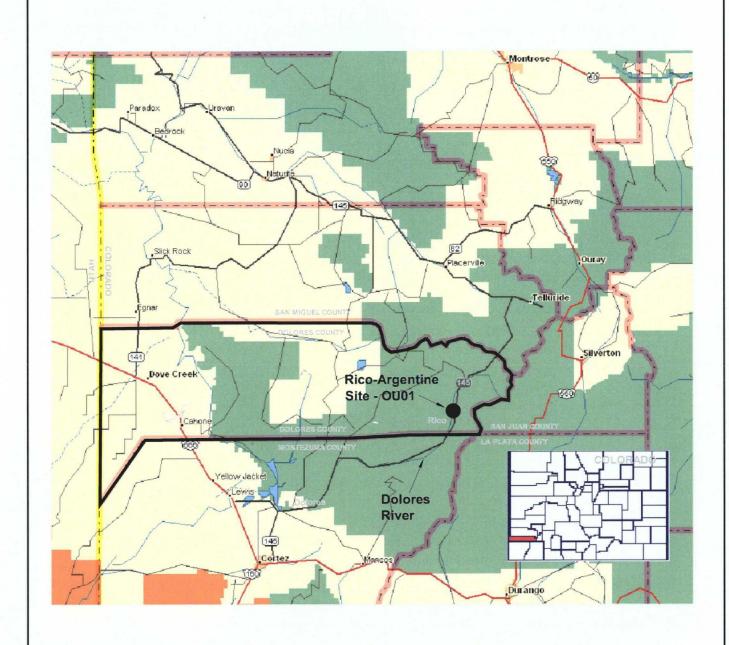
5.0 Schedule and Oversight

A request was made to revise the date of mobilization to the site to begin work to implement the Initial Solids Removal Plan from June 6 to the week of July 8, 2011 to allow for additional in-pond consolidation and settlement. Removal of sediment from Pond 18 will commence in mid to late summer 2011, following approval and construction of the interim drying facility. Removal of Pond 18 solids to the interim drying facility will hkely be completed by late summer, but no later than December I, 2011. The Removal Action Work Plan schedule contemplates the solids removed from Pond 18 will be placed in a new on-site solids repository by no later than December 2013. Removal of solids from the remaining upper ponds will be performed between July 2012 and December 2013. It is anticipated that these removals will be performed as early as practical during this period to allow for the greatest degree of dewatering and consolidation of the solids as feasible. Following adequate drying, EPA's schedule projects placement of existing solids into the solids repository between July 2013 and December 2014.

The activities of selected construction contractor(s) will be overseen by Atlantic Richfield representatives on a full-time, on-site basis. Depending on actual conditions encountered, appropriate adjustments in the sequence and/or the means and methods of removal may be identified. Any such adjustments will be presented to EPA for timely review and approval, and upon approval, implemented by the construction contractor.

In addition to observing the quality of the work, Atlantic Richfield field oversight and design team members will also implement the activities described previously to evaluate performance of the initial removal and interim drying operations.





AECOM

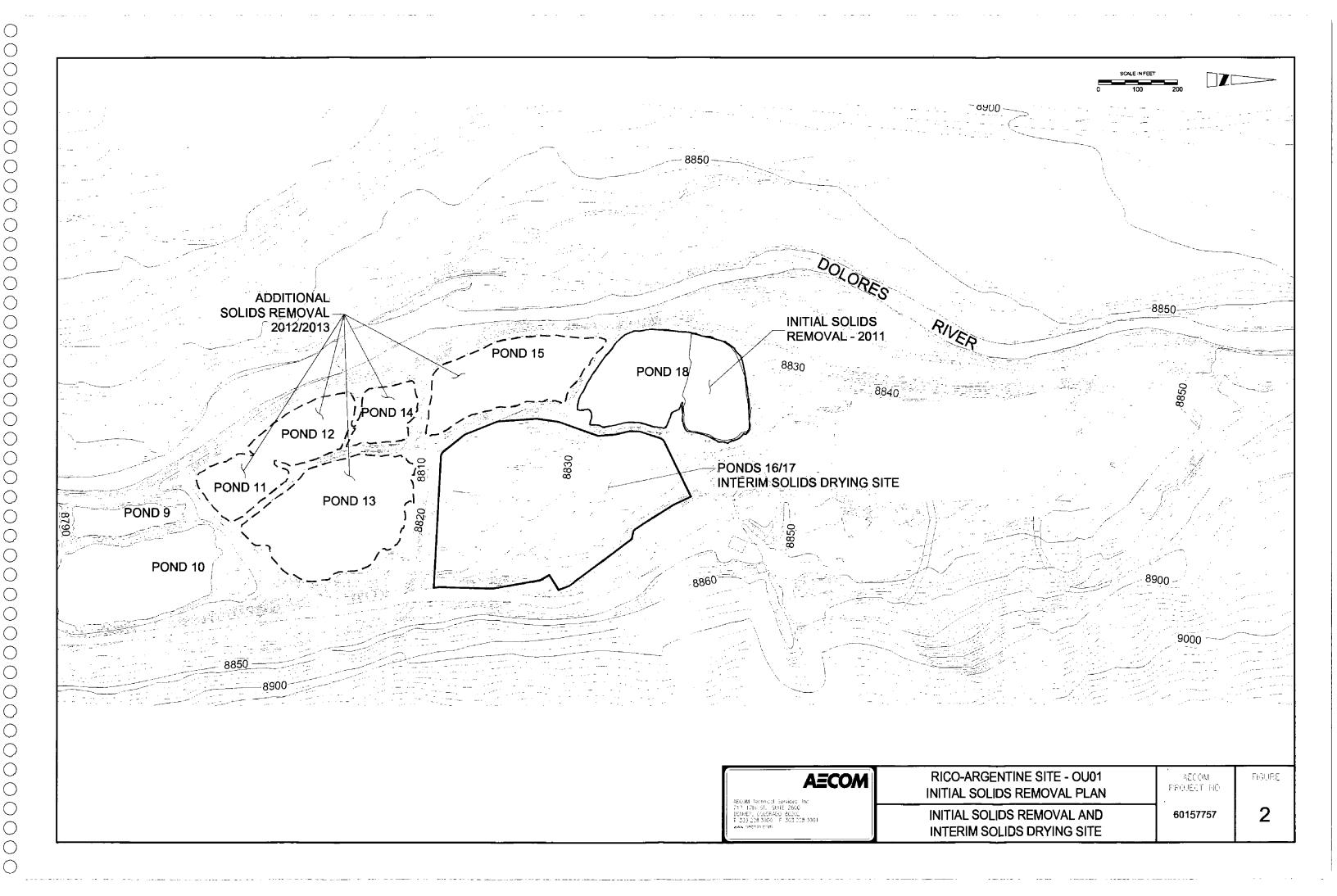
AECOM Tecnnical Services, Inc. 717 17th ST., SUITE 2600 DENVER, COLORADO 80202 T 303.228.3000 F 303.228.3001 www.eecom.com RICO-ARGENTINE SITE - OU01 INITIAL SOLIDS REMOVAL PLAN

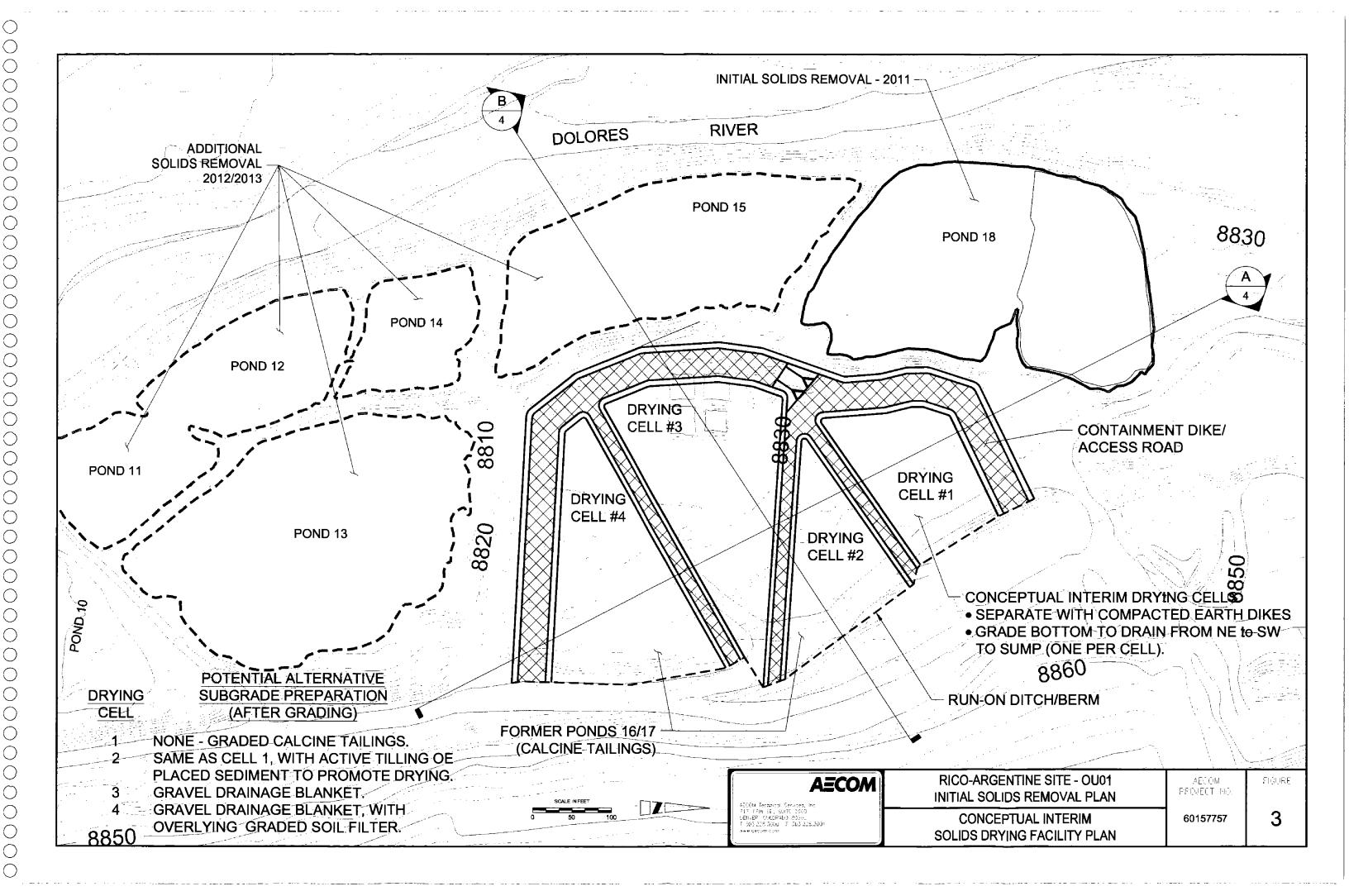
LOCATION MAP

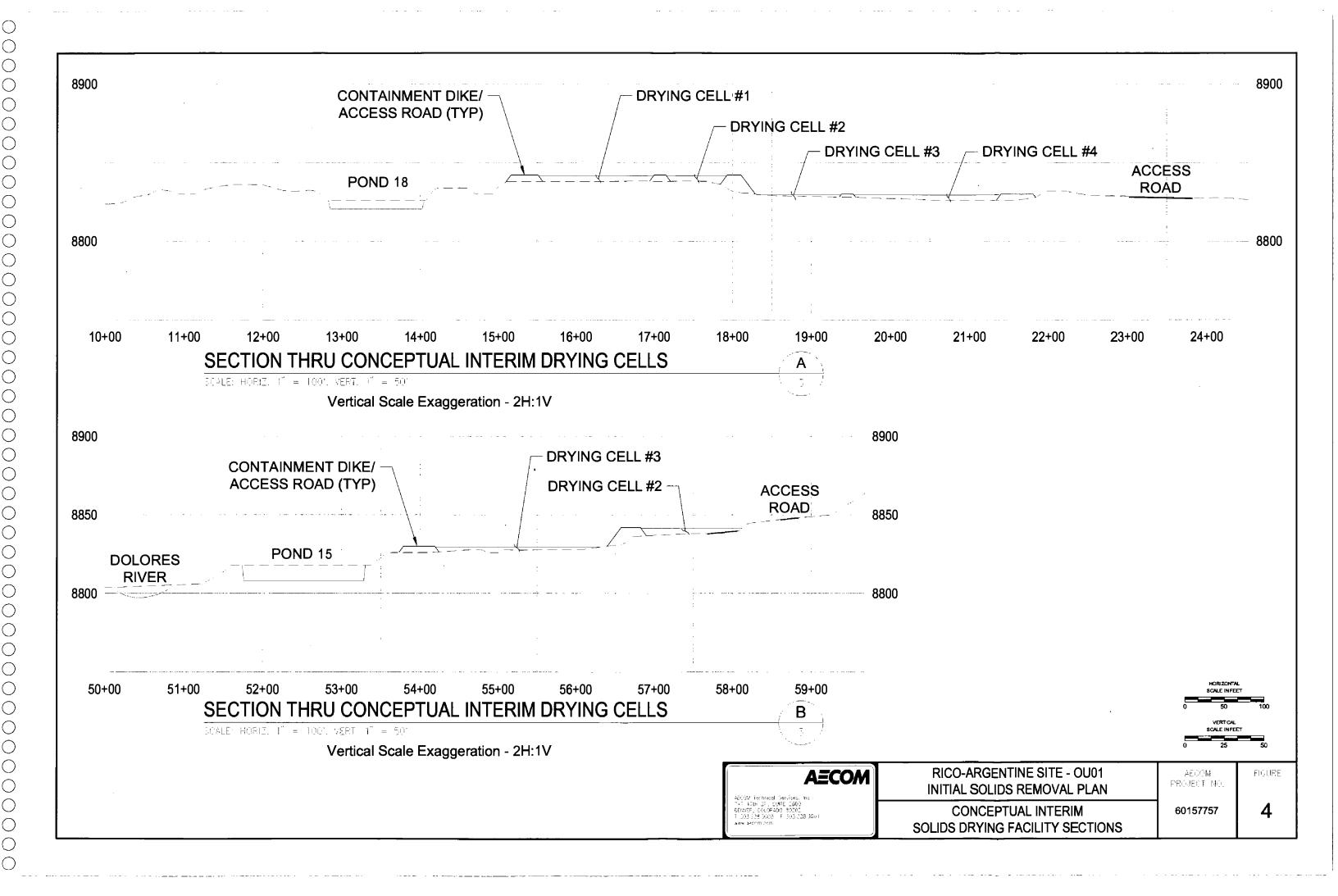
AECOM PROJECT NO.

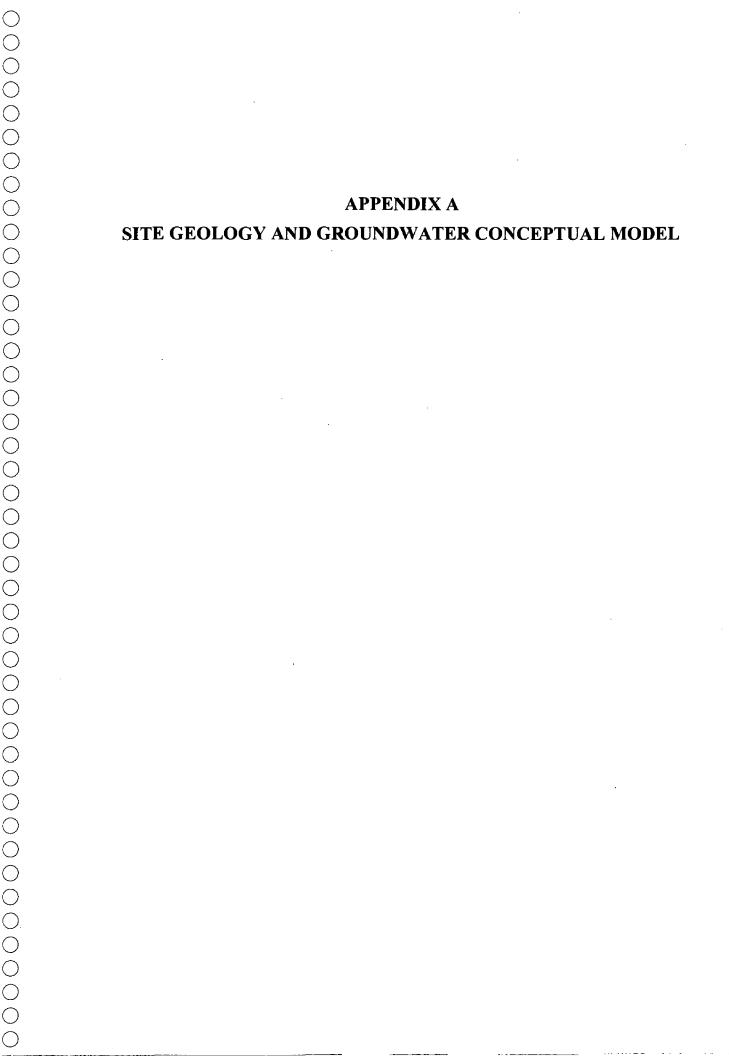
60157757

FIGURE





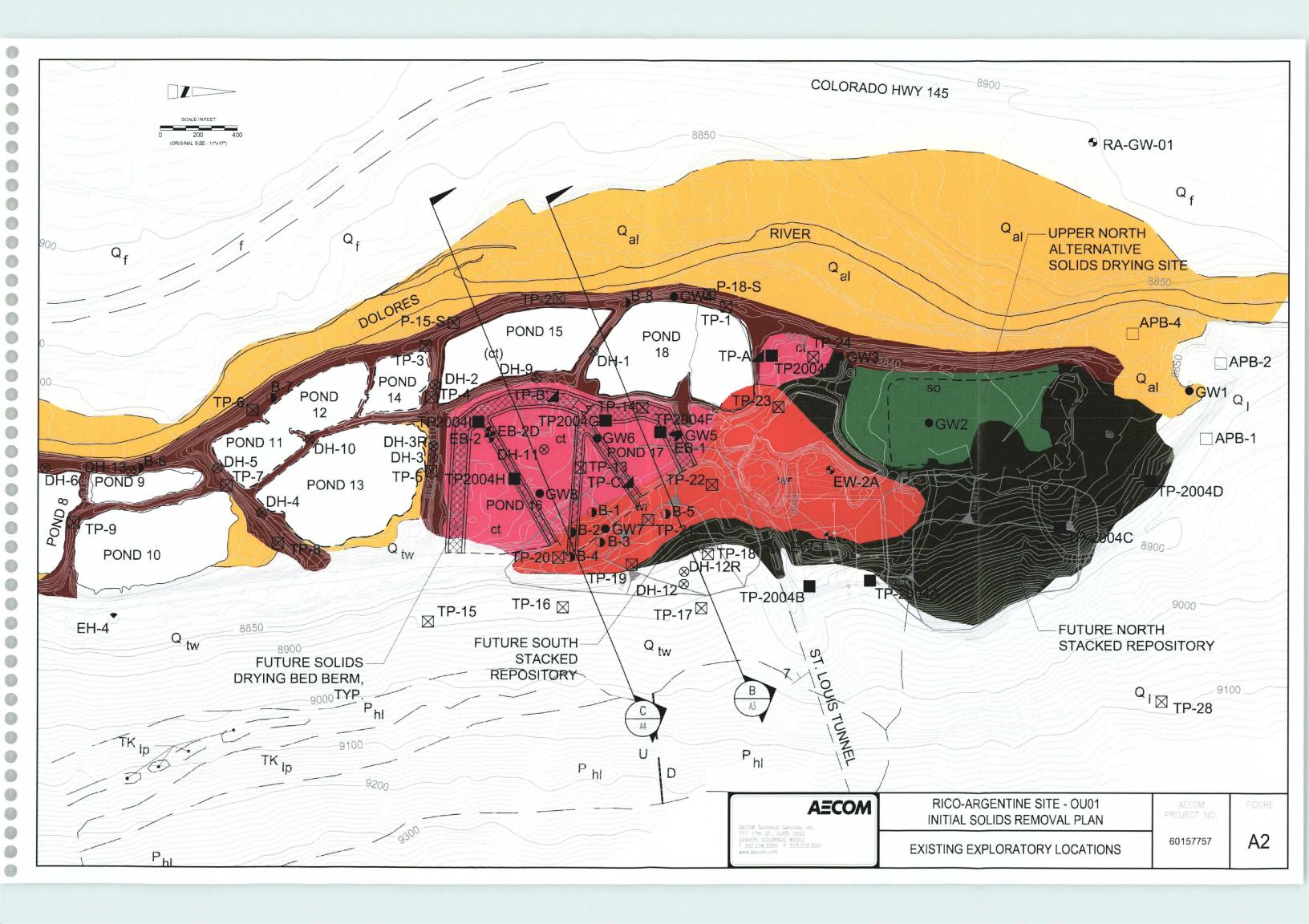


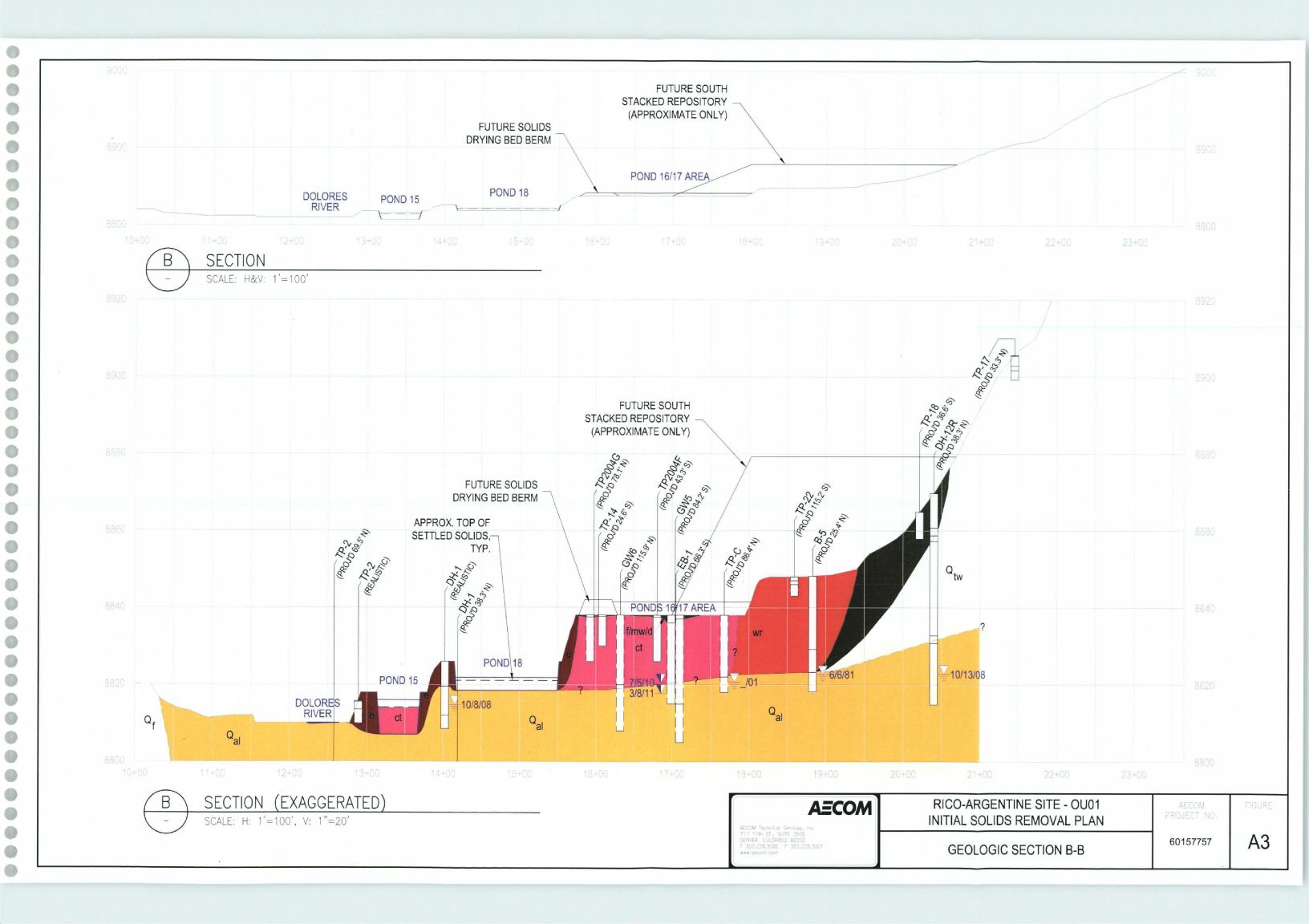


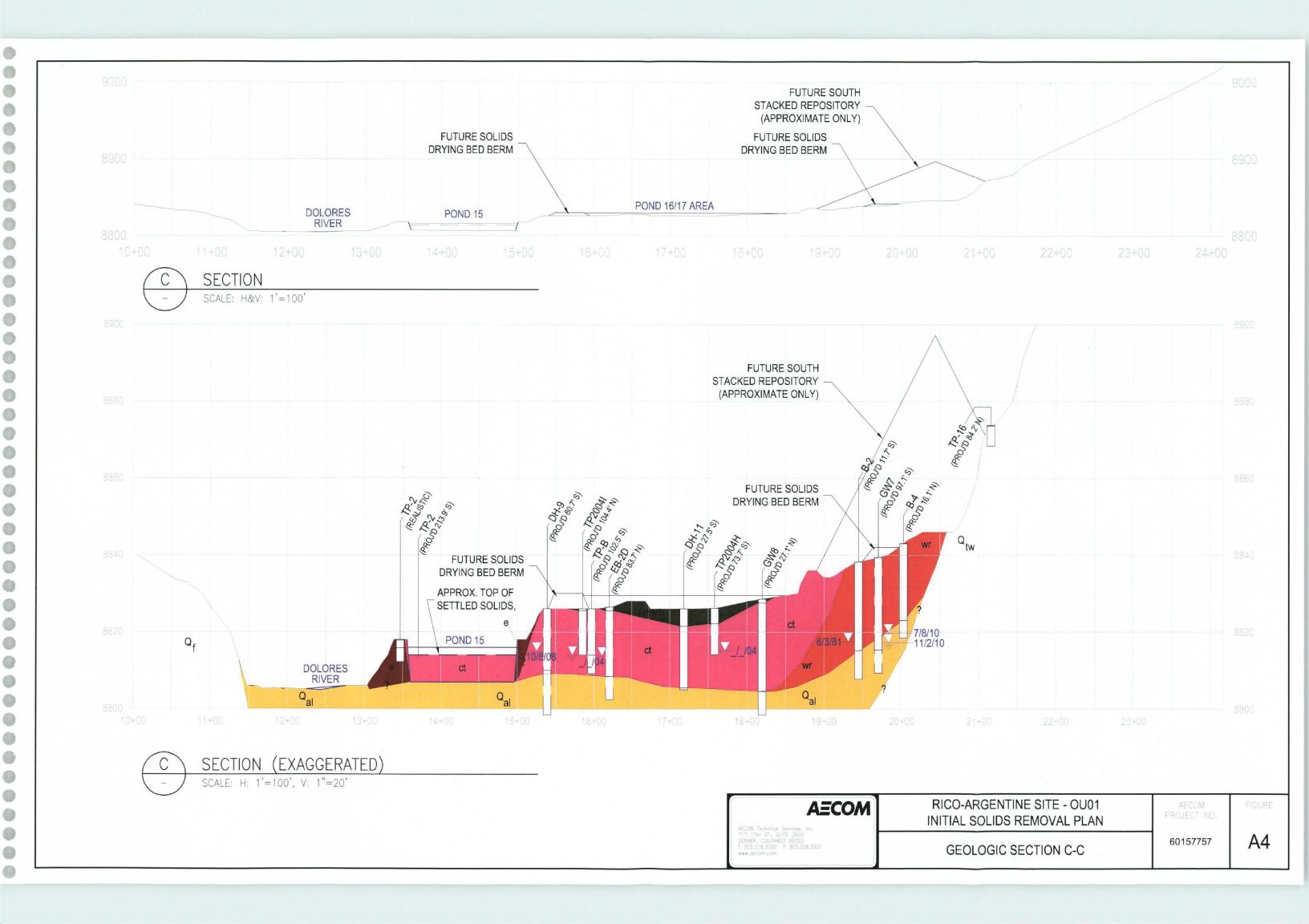
Rico St. Louis Ponds Groundwater Level Measurements

	neter Levels				
Date	GW-4	GW-5	GW-6	GW-7	EB-2
19-Mar-11	Under Snow	21.86	Under Snow	Under Snow	16.74
15-Apr-11	9.6	19.73	19.72	20.81	15.61
19-Apr-11	9.48	19.5	21.15	20.66	15.37
26-Apr-11	9.38	19.19	20.9	20.36	15.15
3-May-11	9.42	18.95	19.12	19.91	15.1
12-May-11	14.21	18.94	19.05	19.75	19.75
18-May-11	9.33	18.7	20.39	19.61	14.84

● EW-1, EB ● GW1 (CD ● B-1 (DAM ● EH-1 (AN ● DOMEST TEST PITS ■ TP-1 (AND	DERSON ENGINEERING/SEH, 2 -1 (SEH, 2004) PHE, 2003) ES AND MOORE, 1981) ACONDA MINERALS)				
✓ TP-A (SEI✓ APB-1 (AN	1, 2001) NDERSON ENGINEERING, 1996))			
e EMBANK f ROAD FIL wr WASTE F ct CALCINE so SPENT C f/mw/d MISCELL (TAILING BURIED I Q al ALLUVIU Q f FAN DEP Q tw TALUS, S	MENT FILL, RIPRAP L, PAVEMENT ROCK TAILINGS RE ANEOUS FILL, MINE WASTE S, WASTE ROCK, ORE), DEMOLITION DEBRIS	TK Ip Pcu Pni M md	CUTLER FORM SILTSTONE, A CONGLOMERA HERMOSA FOI (LOWER MEMI SANDSTONE,	RKOSE AND ATE RMATION BER) - SILTSTONE, SH TONE OR DOLO	· IALE,
	EOLOGIC CONTACT BEDROCK FAULT; D * DOWN-THROWN SIDE, U * UP-THROWN SIDE TRIKE AND DIP OF BEDDING REND AND PLUNGE OF FOLIAT		₩.L. MEAS W.L. MEAS W.L. DURING/E	URED ON DATE	E SHOWN
AECOM Technical Services, Inc., 717 17th St., Suite 2000 Derhee, Couchago 80003 1 303 284 3000 F 203 208 3001 www.pecom.com	RICO-ARGENTINE INITIAL SOLIDS RE GEOLOGIC I	EMOVAL		AECOM PPOJECT NO 60157757	FIGURE







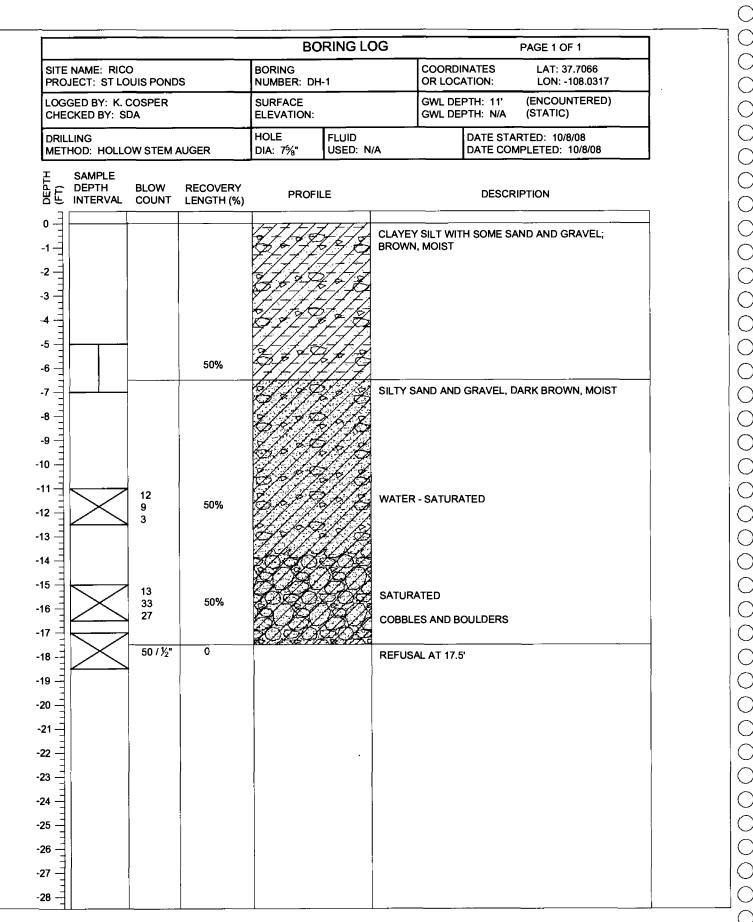
APPENDIX B BORING AND TEST PIT LOGS/ GEOTECHNICAL DATA

Rico-Argentine Site: Pond 16 / 17 Area - Calcine Tailings Summary

Calcine Tailings Deptin, ft	Comment		
0.5 - 12+	Tailings extend deeper than test pit		
0.5 - 12+	Tailings extend deeper than test pit		
4 - 12+	Tailings extend deeper than test pit		
0 - 12+	Tailings extend deeper than test pit		
0 - 12	Sand alluvium at 12 ft		
0 - 16	Sand / gravel alluvium at 16 ft		
3 - 8+	Tailings extend deeper than test pit		
0.5 - 8+	Tailings extend deeper than test pit		
0 - 2	Sand / cobble alluvium at 2 ft		
2 - 23+	Tailings extend deeper than boring		
0 - 18	Cobble alluvium at 18 ft		
1 - 24	Cobble alluvium at 24 ft		
1 - 23	Sand / gravel alluvium at 23 ft		
1 - 17	Sand / gravel alluvium at 17 ft		
0 - 16	Sand / gravel alluvium at 16 ft		
4.5 - 20.5	Sand / gravel alluvium at 20.5 ft		
	0.5 - 12+ 0.5 - 12+ 4 - 12+ 0 - 12+ 0 - 16 3 - 8+ 0.5 - 8+ 0 - 2 2 - 23+ 0 - 18 1 - 24 1 - 23 1 - 17		

Geologic/Geotechnical Data -Well/Boring Logs -Test Pit Logs -Geotechnical Data

	Well/Boring Log
	- Anderson Engineering/SEH, 200
	- SEH, 200
	- CDPHE, 200 - Dames and Moore, 198
	- Dames and Moore, 130
•	



TD = 17.5'

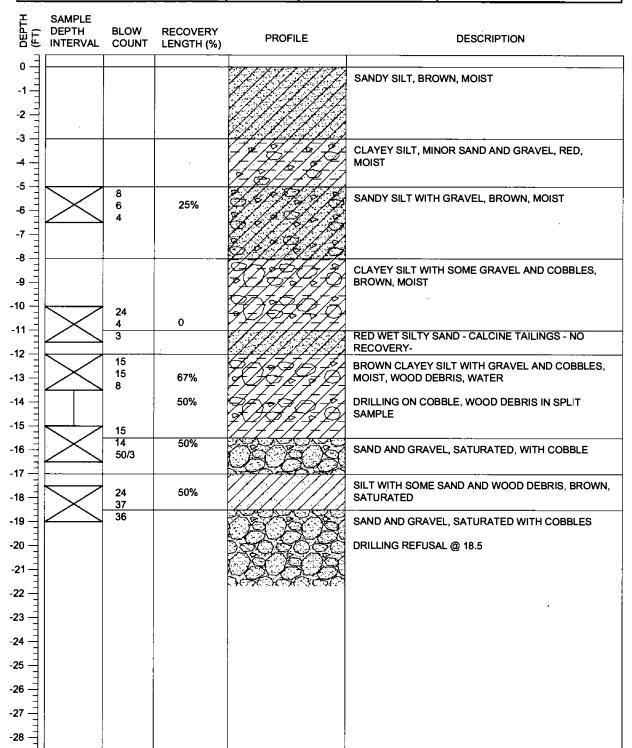
NOTES:

= SHELBY TUBE

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	BC	BORING LOG		PAGE 1 OF 1		
SITE NAME: RICO	BORING	BORING		INATES LAT: 37.705:	-	
PROJECT: ST LOUIS PONDS	NUMBER: DF	NUMBER: DH-2		ATION: LON: -108.0:		
LOGGED BY: K. COSPER	SURFACE		GWL DEPTH: 14' (ENCOUNTERED)			
CHECKED BY: SDA	ELEVATION:		GWL DEPTH: N/A (STATIC)			
DRILLING	HOLE			DATE STARTED: 10/8/08		
METHOD: HOLLOW STEM AUGER	DIA: 75/8"			DATE COMPLETED: 10/8/08		

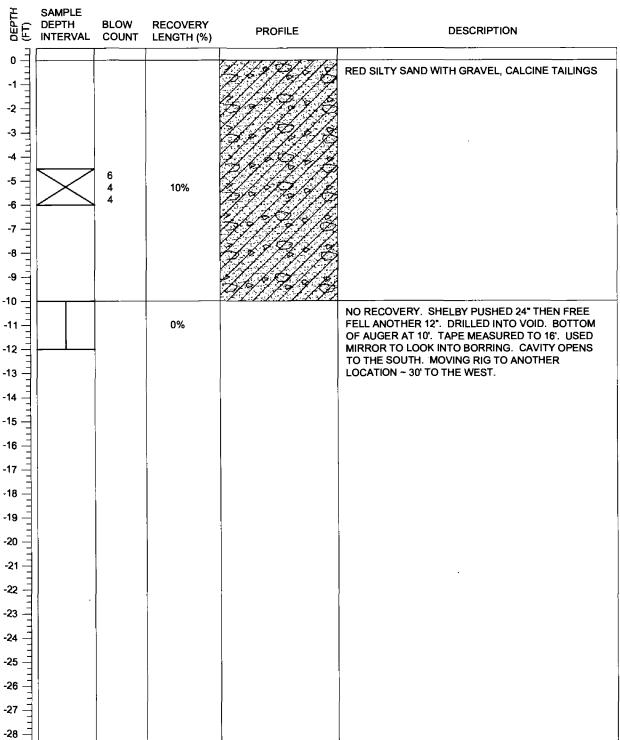


TD = 18.5' NOTES: TRY SHELBLY AT 5'. HIT ROCK, SWITCHED TO SPT, TOO MANY ROCKS. DROVE SPT @12' - HIT WOOD - RECOVERED \sim 1', SMELLS LIKE CREOSOTE. TRY SHELBY AT 14-16 - HIT WOOD. NOTE: COBBLES THROUGHOUT HOLE

= SHELBY TUBE



	В	ORING LOG			PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: D	DH-3	COORDII OR LOCA	-	LAT: 37.7055 LON: -108.0307
LOGGED BY: K, COSPER CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: GWL DEPTH:		(ENCOUNTERED) (STATIC)
DRILLING METHOD: HOLLOW STEM AUGER	HOLE DIA: 7%"	FLUID USED: N/A	•	_	ARTED: 10/9/08 DMPLETED: 10/9/08



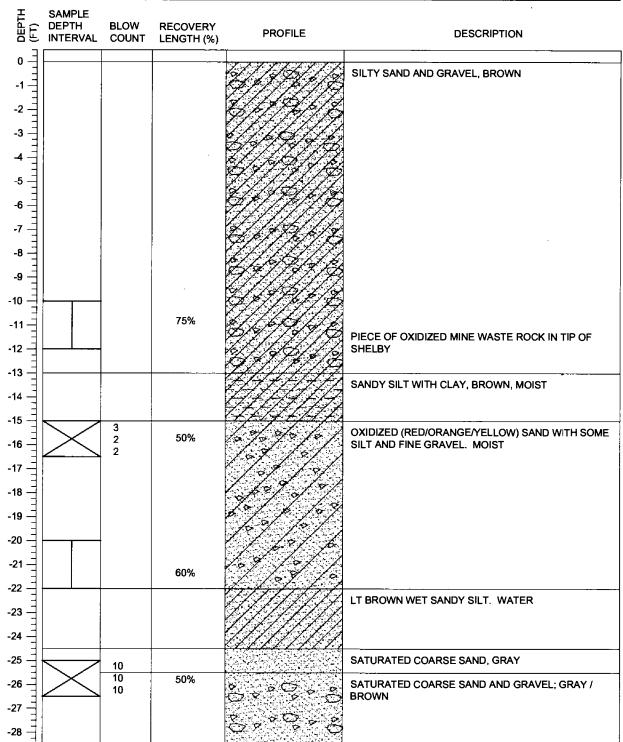
TD = 10'

NOTES: DRILLER THOUGHT WE HIT VOID AT ~ 8'.

= SHELBY TUBE



	BORING LOG			PAGE 1 OF 2		
SITE NAME: RICO	BORING				LAT: 37.7054	
PROJECT: ST LOUIS PONDS	NUMBER: DH-3R				LON: -108.0308	
LOGGED BY: K. COSPER	SURFACE		GWL DEPTH: 24' (ENCOUNTERED)			
CHECKED BY: SDA	ELEVATION:		GWL DEPTH: N/A (STATIC)			
DRILLING	HOLE	FLUID		DATE STARTED: 10/9/08		
METHOD: HOLLOW STEM AUGER	DIA: 75%"	USED: N/A		DATE COMPLETED: 10/9/08		



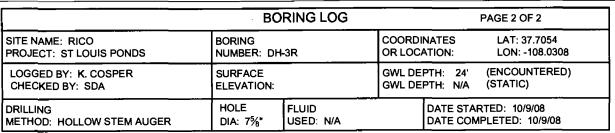
NOTES: 20' SHELBY - ROCK AT BOTTOM; COMPLETELY SEALED END.

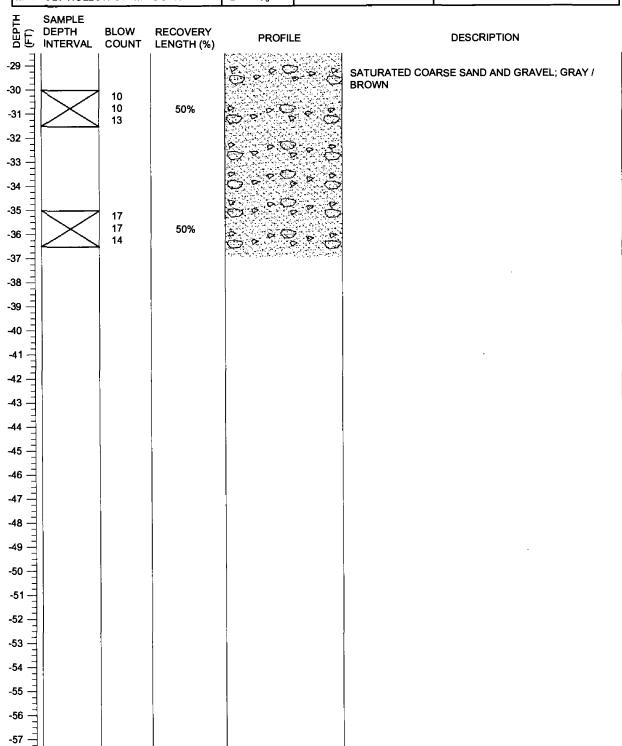
= SHELBY TUBE

TD =

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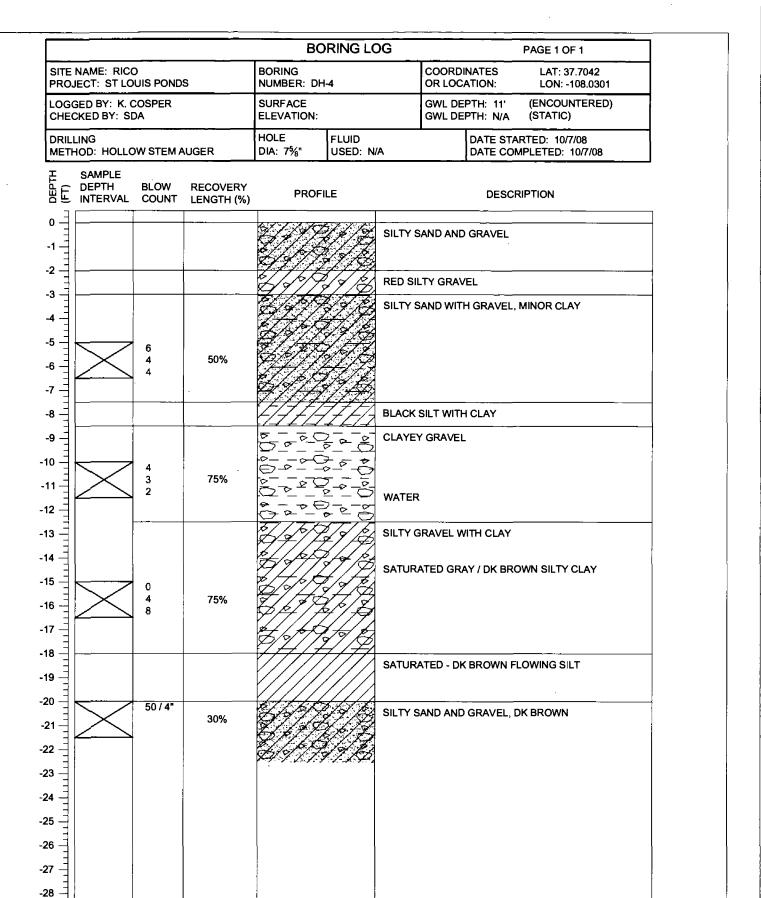
TD = 35'

NOTES:

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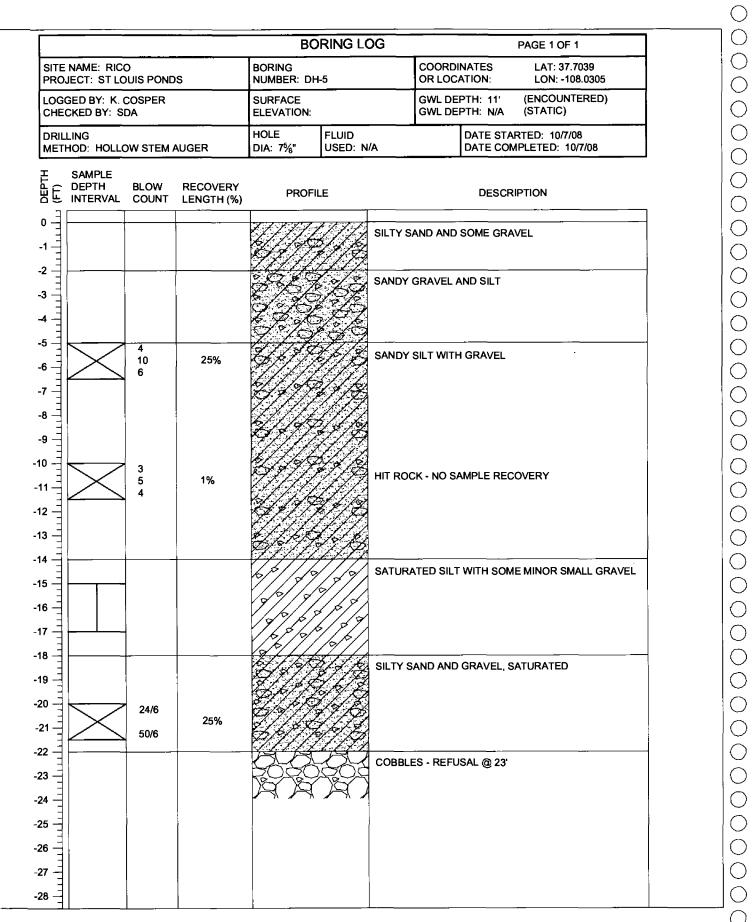
TD = 20.5

NOTES:

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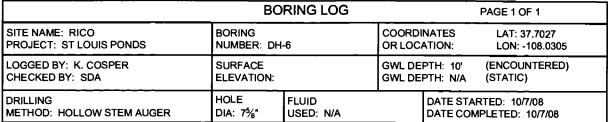
TD = 23'

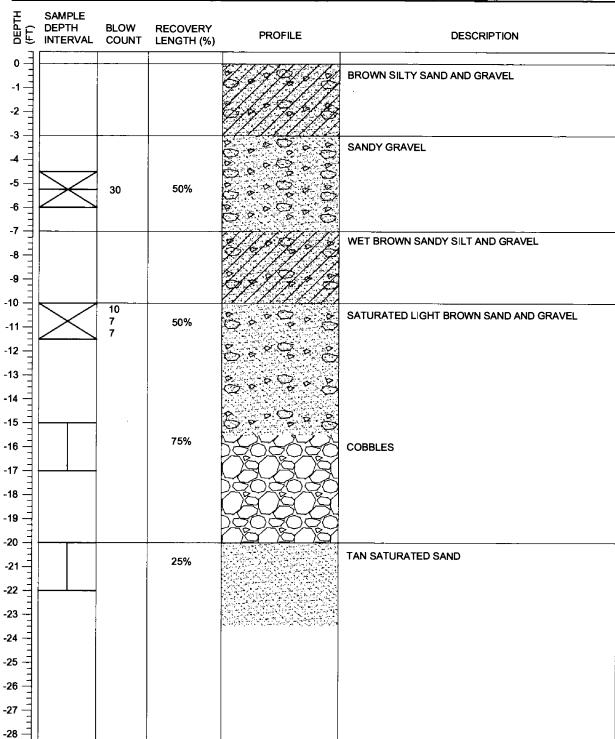
NOTES:

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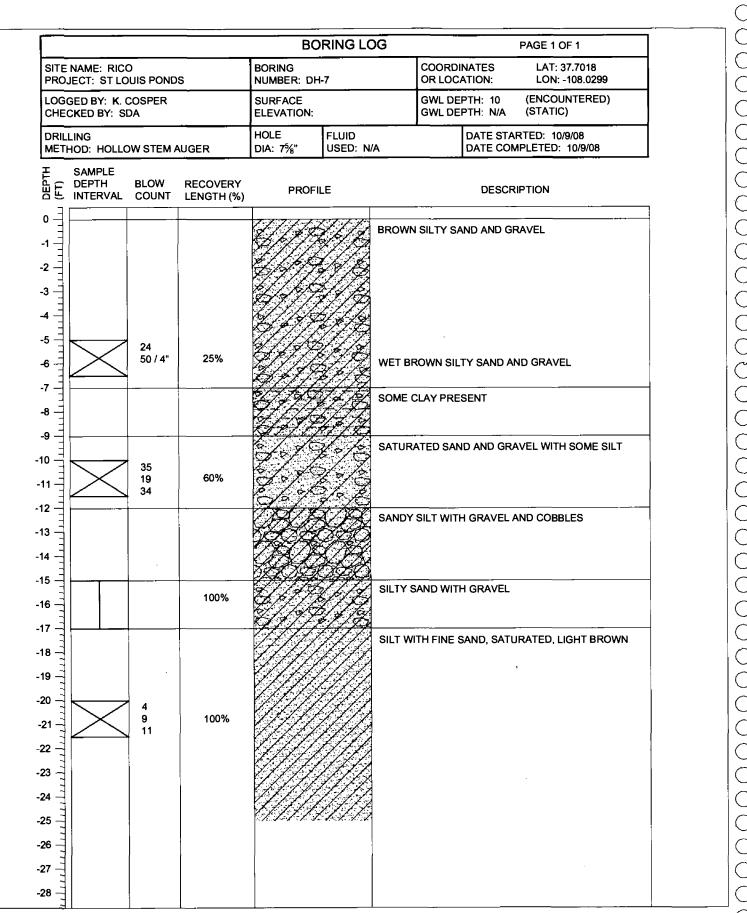
TD = 25' NOTES: ATTEMPTED SHELBY @ 15'. ROCK IN AUGER. SHELBY DESTROYED WITH NO SAMPLE RECOVERY. PUSHED OUT PLUG WITH CENTER PUNCH.

= SHELBY TUBE

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TD = 21.5'

NOTES:

= SHELBY TUBE

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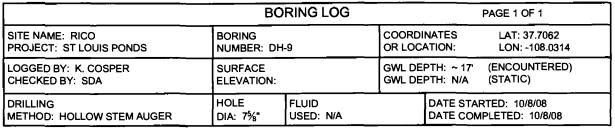
				 .						
				ВО	RING L	og	PAGE 1 OF 1			
	NAME: RICO JECT: ST LC		s	BORING NUMBER: DH	-8		COORDII OR LOCA		LAT: 37.7008 LON: -108.0301	
	GED BY: K. (CKED BY: SI			SURFACE ELEVATION:			GWL DEF	PTH: 6 PTH: N/A	(ENCOUNTERED) (STATIC)	
	LING HOD: HOLLO	OW STEM	AUGER	HOLE DIA: 75%*	FLUID USED: N	/A			RTED: 10/9/08 IPLETED: 10/9/08	
DEPTH (FT)	SAMPLE DEPTH INTERVAL	BLOW COUNT	RECOVERY LENGTH (%)	PROFIL	_E			DESCR	IPTION	_
0 -1 -2 -3 -4 -5 -6 -7 -8 -9 -10 -11 -12 -13 -14 -15 -16 -17 -18 -19 -20 -21 -22 -23 -24 -25 -25 -25	INTERVAL	9 8 29 21 30 20	50%			WATER	SATURAT	GRAVEL, B		
-26 - -27 -	 									

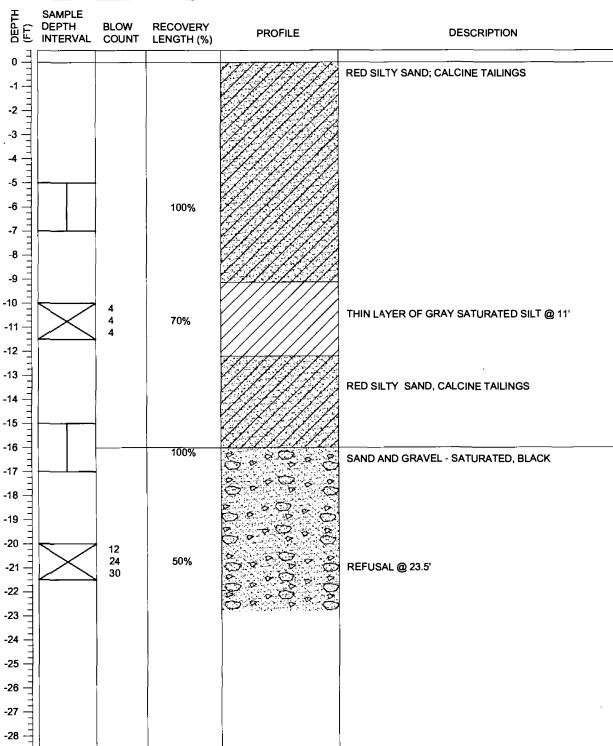
TO = 12' NOTES:

TO = 12' SHELBY TUBE = STANDARD SPLIT SPOON

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TD = 23.5

NOTES:

= SHELBY TUBE

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= STANDARD SPLIT SPOON

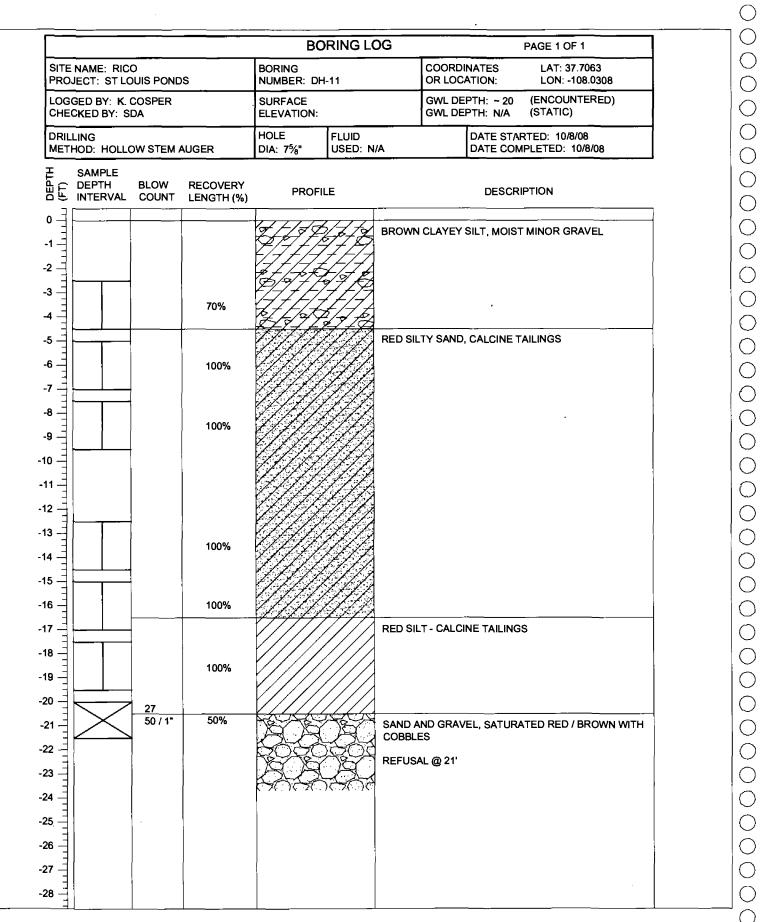


				ВС	RINGLO	og			PAGE 1 OF 1			
	ME: RICC	O OUIS POND	s	BORING NUMBER: DH	I-10		COORDII OR LOCA		LAT: 37.7046 LON: -108.0308			
	D BY: K. (ED BY: SI			SURFACE ELEVATION:				PTH: ~ 13° PTH: N/A	(ENCOUNTERED) (STATIC)			
RILLIN		OW STEM A	AUGER	HOLE DIA: 7%"	FLUID USED: N	/A	DATE STARTED: 10/7/08 DATE COMPLETED: 10/7/0					
₽ DI	AMPLE EPTH ITERVAL	BLOW COUNT	RECOVERY LENGTH (%)	PROFI	LE			DESCR	IPTION			
						BROWN	SILTY SA	ND AND GF	RAVEL			
2								·				
			<25%			BROWN	CLAYEY \$	SILT WITH N	MINOR GRAVEL			
			33%									
						SATURA	TED DAR	K BROWN -	GRAY SILT WITH MINOR			
		10 26 50 / 2	<25%	4	[]	SATURA MINOR S	TED BRO	WN SAND A	AND GRAVEL, SOME			
				Z/9	173			RED AT 17	•			
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TD = 17' NOTES:

TD = 17' SHELBY TUBE = STANDARD SPLIT SPOON (SPT)





TD = 21'

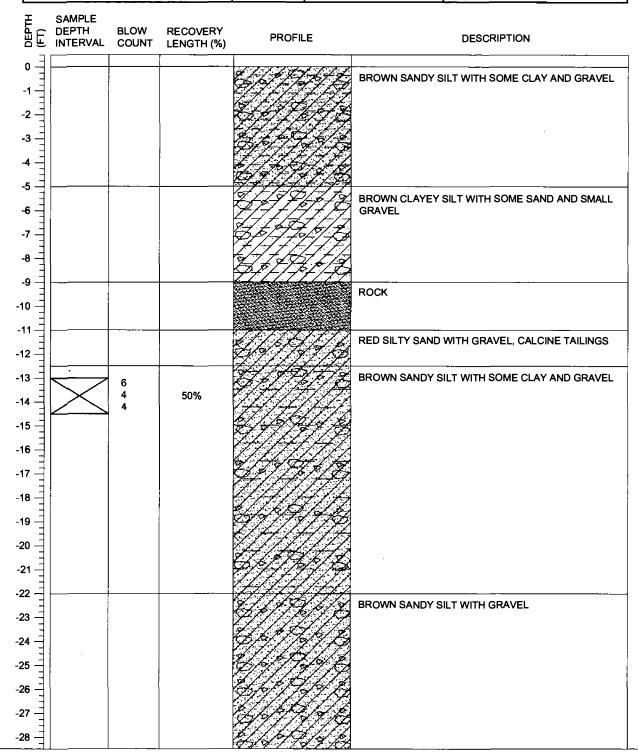
NOTES: ATTEMPTED SHELBY @ 10'; 0 RECOVERY

= SHELBY TUBE

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	ВО	RING LOG			PAGE 1 OF 2		
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: DH	I-12R	COORD! OR LOC		LAT: 37.7073 LON: -108.0297		
LOGGED BY: K. COSPER CHECKED BY: SDA	SURFACE ELEVATION:			PTH: 43' PTH: N/A	(ENCOUNTERED) (STATIC)		
DRILLING METHOD: ODEX	HOLE DiA: 6"	FLUID USED: AIR	DATE STARTED: 10/13/08 DATE COMPLETED: 10/13/08				

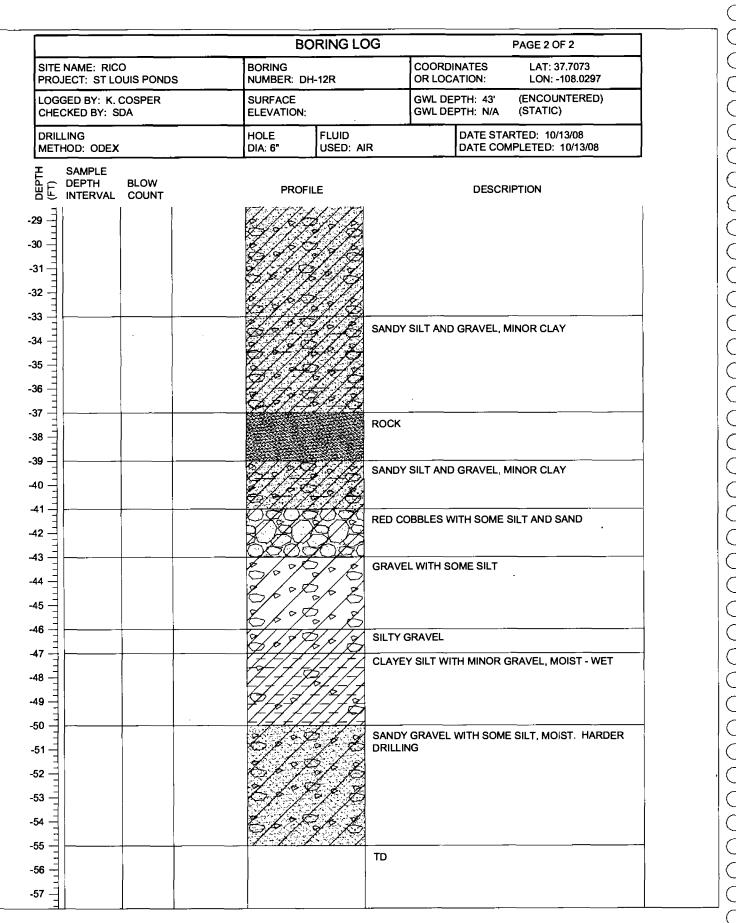


TD = NOTES:

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TD = 55° NOTES: SOME GRAVEL IS CRUSHED ROCK FROM ODEX HAMMER HIT. UNKNOWN ORIGINAL SIZE.

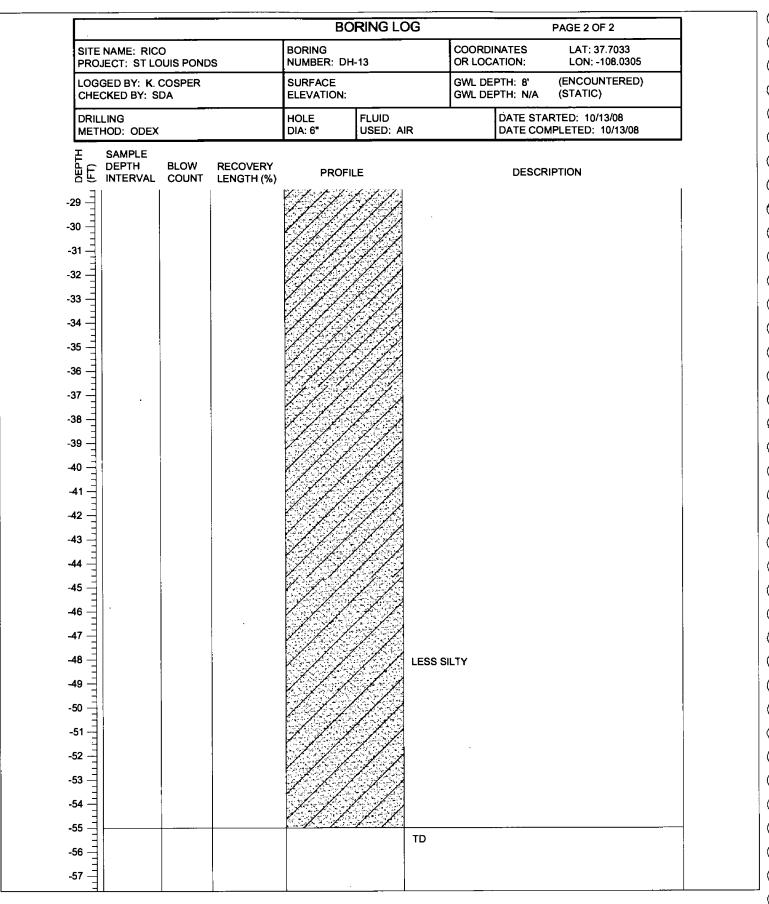
= SHELBY TUBE

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\subseteq						ВО	RING LO)G	PAGE 1 OF 2					
			NAME: RICC ECT: ST LC		s	BORING NUMBER: DH-	-13		COORDI OR LOCA		LAT: 37.703 LON: -108.0			
		LOGG	SED BY: K. (COSPER	<u> </u>	SURFACE ELEVATION:			GWL DE		(ENCOUNTER			
Ŏ		DRILL	.ING			HOLE	FLUID		GVVL DE		RTED: 10/13/08			
		METH	OD: ODEX			DIA: 6"	USED: A	R	•		MPLETED: 10/13			
		DEPTH	SAMPLE DEPTH BLOW RECOVERY INTERVAL COUNT LENGTH (%)			PROFIL	,E			DESCR	IPTION			
00000000000000		0						WOOD E	DEBRIS AND AND	GRAVEL, M	H SOME GRAVE			
0000000		13 — 14 — 15 — 16 — 17 —						SATURA	TED LIGH	IT BROWN :	SILTY GRAVEL			
000000000000000000000000000000000000000		21							MORE S		SILTY SAND			
00000	TD =	ELBY TO	NOTES:	= \$1	ANDARD SPL	T SPOON (SPT)						ANDER ENGINEERING C		





TD = 55'

NOTES:

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State of Wisconsin	
Department of Natural Resources	

SOIL BORING LOG INFORMATION Form 4400-122 Rev. 7-98

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Facilit	у/Ргоје	cl Nam	ie			License				Number	r	Boring		ег			
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_	Penn	-	Name (of crew chiefi(first, last	and Firm	Date Dr	niling :	Started		Da	te Drill	ing Co	mplete	đ	Dril	ling Method	
		estem	1							1/21/	2004		odex				
WI Un	ique W	ell No		DNR Well ID No.	Common Well Nam	e Final Static Water Level Surface Eleva							В		rehole Diameter		
Local	Grid O	rigin I	⊠ 1es	stimated;) or Bo	EW-1		Feet	Site			,850.: Local (5.0	inches	
State		E	<u> </u>	N,	E S/C/N	L	at	<u> </u>	<u>-</u>		LOCAL	orid Ec	N 🔯			⊠E	
NW		of N	<u>W 1</u>	/4 of Section 25,	T 40 N, R 10 W			<u> </u>	<u> </u>		13891				58176	Feet W	
Facility	y ID			County		County C	ode	Į.		City/ or orado	Village	2					
San	nple					1			,			Soil	Prop	erties			
	35. in)	ינט	13	Soil/l	Rock Description					Ì	10					1	
ွစ္မ	Length Att. & Recovered (in)	Blow Counts	Depth In Feet	Ĭ	eologic Origin For			,	=		SSiv	Moisture Content		>		ııts	
Number and Type	Length Att Recovered) w C	ptl	Ea	ch Major Unit		scs	Graphic	Well Diagram	PID/FID	mpre	istu	Liquid Limit	Plasticity Index	200	RQD/ Comments	
					- CD 4315511		5	E 3	ي و	114	3 %	≱ິຽ	2 2	문문	P 2		
ss	24	17-20 15-11			ense, GRAVELL' ganics in surface s						35					Note: Compressive	
Γ			-2		dense, fine to coa			>>>								Strength = SPT N value	
$\frac{2}{SS}$	24	5-7 7-7	-		Y SAND, with gr						14		1			Note: Length	
" <u>\</u>		,-,	-4		_		sc						ĺ			att. on split spoon = 24"	
3 ∏	24	5-11									16		İ				
$\begin{array}{c c} 3\\ SS \end{array}$		5-2	-6										1			1	
. [Ē	Brown, loose, fi	ne to coarse grain	ed,	SC										
ss \	24	4-4 6-3	⊢ 8	Brown, loose to	very dense, fine to	coarse					10				ļ		
Δ		ļ	Ē	grained, CLAYI	EY SAND and gra	vel								-			
5 SS \	24	2-8 4-5	10 								12			-		Ì	
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			20										1				
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8 17	24	50	F-22	Brown-gray, ver	y dense, fine-coar	se	 -	{	1 1		50						
ss X			Ė	GRAVEL, with			GP	600	1								
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This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stnts. Completion of this form is mandatory. Failure to file this form may result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

SOIL BORING LOG INFORMATION SUPPLEMENT Form 4400-122A

_	ple									Soil	Prop	erties		
	Length Att. & Recovered (in)	ınts	Depth In Feet	Soil/Rock Description And Geologic Origin For					Compressive Strength	i				ts
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State of Wisconsin	
Department of Natural Resourc	es

SOIL BORING LOG INFORMATION

Department of Natural Resources								Form 4400-122 Rev. 7-98											
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Number and Type	Length Att. & Recovered (in)	Blow Counts	Depth In Feet		E	ach Major Uni	it		scs	Graphic Log	Well Diagram	PIDÆID	Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	200	RQD/ Comments	
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ss X	24	1-3 12-9	Ė			dense, GRA				\ggg		ĺ	15					Note: Compressive	
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This f	orm is a	uthori	zed by	Chapter	s 281, 283, 28	9, 291, 292, 2	93, 295, an	d 299, W	is. Sta	ts. Cor	npletio	n of th	is form	is mai	ndatory	. Failu	re to fi	le this form may	

result in forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed form should be sent.

State of Wisconsin	
Department of Natural	Resources

SOIL BORING LOG INFORMATION

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Department of Natural Resources				rom	n 44.00-12	. 2		Re	V. /-70	•	C
Roule To: Walershed/Waslewater	Waste !	Manag	ement 🗆								\overline{C}
Remediation/Redevelopment	Other										
							Pag	e j	of	2	
Facility/Project Name	License/	Permit	/Monilorir	ng Num	nber	Boring	Numb				\subset
St. Louis Ponds Area, Rico, Colorado	l l		0105.00	-		`	•	EB	-1		
Boring Drilled By: Name of crew chief (first, last) and Firm	Date Dri	Iling S	tarted		Date Dri	lling Co	mplete	d	Dril	ling Method	\mathcal{C}
Jeff Pennell Layne-Western		11/15/2004 Final Static Water Level St				11/18	/2004			a/odex	Č
WI Unique Well No. DNR Well ID No. Common Well Na EB-1	1		iter Level Feet Site	- 1	rface Elev	ation .9 Fee	t Site	Bo	Borehole Diameter 8.0 inches		
Local Grid Origin (estimated) or Boring Location	La		0 !	<u>l.</u>		Grid Lo	ocation				\subset
State Plane N, E S/C/N NW 1/4 of NW 1/4 of Section 25, T 40 N, R 10 1	1		• ,		 1388	792 Fee	N⊠ S⊡ts		57917	⊠ E Feet □ W	C
Facility ID County	County Co		Civil Tow	-	or Villa					<u></u>	C
			Rico, C	olora	do		D			<u> </u>	\cdot
Sample					ļ	501	Prop	erties			
Number and Type Length Att. & Recovered (iii) Blow Counts Blow Counts Each Major Unit Each Major Unit					e K		1				
And Geologic Origin For Each Major Unit		S	. ی	E (C See	일 일 일	_	À		ients	
Number and Type Length Att. & Recovered (ii) Blow Counts Each Major Unit Each Major Unit		sc	Graphic Log Well	ing	PID/FID Compres	Moisture	quic	Plosticity Index	200	RQD/ Comments	
	E DOCK	Ω	© 2 ≥		62	<u>Σ</u> Ο	12.7	트 트	4	a∠ O Note:	\cdot
SS 24 29-44 FILL: Gray, very dense, WAST igneous cobbles	E KUCK,				02	1				Compressive	
FILL ("Calcine Tailings"): Purp	le-maroon				1,5				ļ	Strength = SPT N value	
$\frac{2}{55}$ $\sqrt{\frac{24}{313}}$ to gray, loose to medium dense,					16		1		1	Note: Lengtl	\searrow
very fine grained. SILTY SAINL	, rare	·								att. on split spoon = 24"	
3 SS 24 4-9 9 9 14 9 15 15 15 15 15 15 15					17		1	1	1	ļ ·	C
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I hereby certify that the information on this form is true and correct to											C
Signature Firm	SEH I	nc	42] Frenenc Chippewa F www.sehine	Falls, W.						1: 715.720.620 c: 715.720.630	
This form is authorized by Chapters 281 283 289 291 292 293 29					nf this for	m is ma	ındətor	. Faile			$\overline{}$

This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats. Completion of this form is mandatory. Failure to file this form may result in forfciurc of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be be used for any other purpose. NOTE: See instructions for more information, including where the completed for should be sent

SOIL BORING LOG INFORMATION SUPPLEMENT Form 4400-122A

	g Num	ber	EB-	Use only as an attachment to Form 4400)-122.						 ge 2	of	2
Number and Type	Length Att. & ad Recovered (in)	Blow Counts	Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	nscs	Graphic Log	Well Diagram	PID/FID	Compressive Strength	Moisture Content	 Plasticity Index	P 200	RQD/ Comments
⁷ ss ∑	24	22-20	26 -28 -30	Brown, dense, fine to coarse GRAVEL (alluvium), much fine to coarse grained sand. End of boring at 33' (refusal)	GP		ÎHULLIHILIHÎ		44				
		, and the same of		End of boring at 33 (refusal)									

State of Wisconsin	
Department of Natural Resour	ces

SOIL BORING LOG INFORMATION

SOIL DOKING	LOG INFORMATION
Form 4400-122	Rev. 7-98

Route To: Watershed/Wastewater	Waste N	Manag	ement 🗆	כ								
Remediation/Redevelopment	Other											
								Pag	e l	of	1	
Facility/Project Name	l icense/	Permit	/Monitor	ine Ni	ımber	- 1	Boring				<u> </u>	
St. Louis Ponds Area, Rico, Colorado	License/Permit/Monitoring Number Boring AARCOE0105.00					· vailio	EB	-2				
Boring Drilled By: Name of crew chief (first, last) and Firm	Date Drilling Started Date Drilling Co								line Method	. 🔾		
Jeff Pennell										hollow stem		
Layne-Westem		11/19	9/2004			11/19/2004					ger	
WI Unique Well No. DNR Well ID No. Common Well Name				I S	urface	Eleva			Во		Diameter	
EB-2			eet Site		8	,826.8	Feet	Site	- }	8.0	inches	
Local Grid Origin 🔯 (estimated: 🔲) or Boring Location 🔲	1 .					Local C						\cdot
State Plane N, E S/C/N	La	1						□N	ļ		ΠE	
NW 1/4 of NW 1/4 of Section 25, T 40 N, R 10 W	Long	<u> </u>	-		<u></u>			□ s			Feet 🗌 W	
Facility ID County C	County Co	de	Civil To		-	Village	!			-		\mathcal{C}
			Rico,	Colo	<u>rado</u>							-(
Sample			1	Ì			Soil	Ргор	erties			
Soil/Rock Description												
And Geologic Origin For	l			_ [_	2517					Şī	C
Each Major Unit		c s	울	E E	Æ	pre	ture	.p	ioity	_) mer	
Number and Type Length Att. & Recovered (in) Blow Counts Depth In Feet Each Wajor Unit Each Wajor Unit		n S	Graphic Log	lag ve	PID/FID	Compressive Strength	Moisture Content	Liquid Limit	Plastioity Index	P 200	RQD/ Comments	
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m F biomogue achblos	(OCIN,					10					Note:	
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			\bowtie								Strength = SPT N value	
2 2 24 4-4 very fine grained, SILTY SAND, ra	ire			i II		9		•			Note: Lengtl	ьC
SS 5-4 -4 gravel			\bowtie					ļ			att. on split	
3 7 24 3-3						9					spoon = 24"	
3 SS 24 3-3 5 6-3 6-6						ļ				i	1	
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End of boring at 24'		1	1673									
24 End of corring at 2 v												
I hereby certify that the infonnation on this form is true and correct to the best of my knowledge.												C
Signature R. Relo Firm SE	LI I	n A	421 Frene Chippewa	tte Dri	ve WI 54	729				Te	l: 715.720.62 0	0
Laure 12, rela SE		110	www.sehi	nc.com	1	, + /					x: 715.720.630	
This form is authorized by Chapters 281, 283, 289, 291, 292, 293, 295, at	nd 299. W	is, St	ats. Com	pletio	n of th	nis form	is ma	ndatory	. Failu	re to f	ile this form m	av.

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State of Wisconsin	
Department of Natural	Resources

SOIL BORING LOG INFORMATION

Fonn 4400-122 Rev. 7-98

			Ro	ute To:	Watershed/W Remediation/			Waste Other		gement								
															Pas	e l	of	2
•	/Proje							License			_	Numb	er	Boring	Numb	er		
					Colorado		_	AARCOE0105.00 Date Drilling Started Date Drillin				EB-2D Iling Completed Drilling Meth						
-		-	Name (of crew cl	nief (first, last)	and Firm		Date Di	alling 3	started		L	Dale Drill	ing Co	mplete	d	Drill	ling Method
	Penno ne-Wo		า				•		11/1	8/200	4			11/19/	2004		oc	lex
WIUm	ique W	ell No).	DNR W	ell ID No.	Common '	Well Name	Final St				Surf	ace Eleva			Bo		Diameter
								}	Feet	Site			8,826.				5.0	inches
		rigin	(es	timated:	or Bor		on □ ¨ C/N	l ,	at	٥			" Local	Grid Lo	cation			
State I		of N	u ,	/4 of Sect	•	E 570 T 40 N		İ		0	,		" 12002	04 Fas	Λ⊠ S□:		. 7020	⊠ E
Facilit		OI: IN	44 1		County	1 40 N		Lor County C		Civil 7	Town/C	ity/	r Village		<u> </u>	220	3/920	Feet W
	•				•			•			, Col	-	_					
San	ple								T					Soil	Prop	erties		
	& in)	'n	#		Soit/R	ock Descri	ption						.,					
9	An.	Junt	F.		And Ge	ologic Orig	in For				_		SSive		,	, l		1ts
Number and Type	Length Att. & Recovered (in)	Blow Caunts	Depth In Feet		Eac	h Major Ur	nit		CS	Graphic Log	Well Diagram	PID/FID	Compressive Strength	Moisture Content	밀골	Plasticity Index	9	RQD/ Comments
Nun	Len Rec	Blo	Cep						US	Grap Log	Wel	PE CE	Con	Con	Liquid Limit	Plastic Index	P 200	Com
			E		Gray, very	dense, \	WASTE	ROCK,										
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'			F-2		("Calcine T y, loose to r				 	\otimes		Ì			1			
1	24		E		fine grained.											•		Note:
SH			-4	grave			•		1									Compressive Strength =
2	24		F														1	SPT Ñ value
2 SH	_		-6	Ì					1	\bowtie	3			}		1	1	Note: Length att. on split
1 10	24		ļ.			•				$\otimes\!\!\!\otimes$				1		1		spoon = 24"
ss X	24		-8							$\otimes\!\!\!\otimes$	3							3" diameter split spoon
_ ^	24		E						1		3			İ	1			used (no shelby rec)
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22 N		1-4	<u></u> 16							\bowtie	3	}				ļ		
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			-18	Brow	n. dense, fir	e to coar	rse GRA	VEL	 	1000	[1			ļ		1	
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			<u>-</u> 20	sand.						100	1							
			F						GP	P.O.	1			1	ļ		l	
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l herel	y certi	fy that	the inf	ormation	on this form is	true and c	orrect to the	e best of	ny kno	wledge			•	-				
Signat	-	•		. ດ	-0				-	_		ive					Tel	l: 715.720.6200
	<u> </u>	<u>ov</u>	<u>u</u>	<u>l K</u>	. Klec	<u> </u>	Firm SI	HI	nc	Chippew www.sel	va Falls. <u>htne cor</u>	WI:	4729					:: 715.720.6200 :: 715.720.6300

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SOIL BORING LOG INFORMATION SUPPLEMENT FORM 4400-122A

ample				1			₁	Soil	Prop	erties		
and Type Length Att. & Recovered (in)	Blow Counts Depth In Feet	Soil/Rock Description And Geologic Origin For Each Major Unit	USCS	Graphic Log	Well Diagram	PID/FID	Compressive Strength	Moisture Content	Liquid Limit	Plasticity Index	P 200	RQD/ Comments
		End of boring at 24' (abandoned to EB-2, approx. 10' to east)	moved									

and being the orbidition of the second control of the second contr DVALEVA SVINEDE SAMMES ELECTRICA TROTENTS ENTENDATENTS Project Number: Rico Light Industrial Park Project Name: Rico Light Industrial Park Well Number: RLP-GW1 Well Location: Rico Light Industrial Park Time / Date: 10/16/02 Elevation: 8,800 msl Weather: Drilling Method: 4-Inch Hollow Stem Auger Clear Skies, Partly Sunny 60°F Development Company: Kayenta Consulting Slight Breeze Date Development Started: Daje Development Completed: 10/16/02 10/16/02 Screen Intervals: Well Diameter: 2 Inch 4ft. To 9 ft bes Depth of Well (L*): 9 ft Depth to Water Before Development (L1): Height of Water Column (L* - L1): 6 tt. Depth to Top of Sediment (Li) <u>9</u> fl. Sediment Thickness (L* - L'): Na_ft Well Volume: 0.96 cal. Total Volume Pumped: 30 gal. 0.16 gallous per foot on a 2-Inch Well Number of Well Volumes Pumped (total volume pumped/well volume): 30+ volumes pumped on 10/16/02 Monitoring Well Sample Data: Well RLP-GW1 Date Temp Gallons Parged Observations 10/16/02 11.2 7.37 Slightly turbid 10/16/02 10.8 7.36 Clear, Slightly Imbid * Sample collection cootinued after well development meludes well development purge voknnes

Lithology

Checked By

Sample Collected

Date

Native rocky cobble material

10/16/02 @ 1345

0-9 feet

Presented By

CDREE

ANTER DE LE VIRLE OF PAMERINE. TRASTEA ANTÉIS SANTEMEN PÉRRALES CIMENTAIRES.

Project Number: Rico Light Indu	ıstrial Paric	Project Name: Rice	Project Name: Rico Light Industrial Park							
Well Number: RLP-GW2		Well Locatian: Ric	o Light Industrial Pa	rk						
Time / Date:	10/16/02		Elevation:		8,800 msl					
Drilling Method:	4-hich Holl	ow Stem Auger	Weather:	!	Clear Skies, Partly Sunny 60°F					
Development Company:	Kaventa Co	onsulting		!	Slight Breeze					
Date Development Started:	10/16/02		Date Development Comple	ted:	10/16/02					
Screen Intervals: 10.5 ft. To 20.5 ft bgs			Well Diameter:	;	2 Inch					
Depth of Well (L"):	<u> </u>	20.5_ft.	Depth to Water Before Dev	vekipment (L'):	6.5 n					
Height of Water Column (L" - L'):		2.0 ft.			ł					
Depth to Top of Sediment (Li)			Sediment Thickness (L" - I	L'):	<u>Na_</u> ft.					
Well Volume:		0.32 gal.								
Total Volume Pumped:		5 gal.								
Number of Well Volumes Pumped	(total volur	me pumped/well volume):	4x volumes pumped on 10	/16/02	0.16 gallons per foot on a 2-Inch Well					
	М	onitoring Well Sample	Data: Well RLP-G	W2						
	Гетр	рН	Good	Gallons Purg						
10/16/02	11.9	7.29	1004	Purged dry four Total of 5 gallons						
* Sample collection continued after w	ell develotanen	t includes well development p	urge volumes							
10/16/02 @ 1620					Sample Collected					
		T ,ith	ology							
0-12 feet Spent py in color.	retic ore with m Leach pad line	nixed coble and rock. Ore mat r at 12 feet bgs								
12-20.5 feet Native n	ocky cobble mat	terial								
Presented By		Date	Checked By	·	Date					

EDIVATE		1.08461	TBYBAYADIC DAL A. AANGO SAG	ALPANIE					
		100	AMES SAME						
Project Number: Rico Light Indus	trial Park	Project Name: Ric	o Light Industrial Pa	ark					
Well Number: RLP-GW3		Well Location: Ric	Well Location: Rico Light Industrial Park						
Time / Date:	10/16/02		Elevation:		8,800 tnsi				
Drilling Method:	4-Inch Hollow Ster	n Auger	Weather:		Clear Skies, Fartly Sunny 60°F				
Development Company:	Kayenta Consulting	z			Slight Brecze				
Date Development Started:	10/16/02		Date Development Compl	leted:	10/16/02				
Screen Intervals: 7 ft. To 16.5 ft bgs	·		Well Diameter:	2 Inch					
Depth of Well (L*):		<u>16.5</u> fl.	Depth to Water Before De	evelopment (L¹):					
Height of Water Column (L" - L'):		9.5 AL							
Depth to Top of Sediment (Li)	·	16.5 ft.	Sediment Thickness (L" -	L'):	Na_ft.				
Well Volume:		1.12 gal.							
Total Volume Pumped:		15 <u>e</u> al.							
Number of Well Volumes Purnped	(total volome pum	ped/well volume):	14 volumes pumped on 1	0/16/02	0.16 gallans per foot on a 2-Inch Well				
	Monitor	ring Well Sample	Data: Well RLP-G	:W3					
Date Ter	mp	pН	Cond	Gallons Par	ged Observations				
10/16/02 11		6.46	1526	5	Slightly turbid				
10/16/02 10 10/16/02 10	0.6	6.45 6.44	1529 1484	7 8	Slighdy tmbid Slightly lurbid				
	0.8	6.42	1512	9	Clear, Slightly turbid				
* Sample collection continued after well	development include	es well development p	urge volumes						
10/16/02 @ 1100					Sample Collected				
		T (sh	ology						
0-3.5 feet Spent pyret	ic ore with mixed co		ology						
	y cobble material		<u> </u>						
,	<u> </u>								
Presented By	Date		Checked By		Date				

COMEE			idiny er se								
i digi ago ga maga ko indhistentina ga konga Hasa sa ka ko sa sa ba	(Productive s	建 等放送程度 经基础		The terms of the second							
		E SULOI	ementem en e	(0.10)Y							
Project Number: Rico Light Indus	trial Park	Project Name: Ric	o Light Industrial Pa	ark							
Well Number: RLP-GW4		Well Location: Rico Light Industrial Park									
Time / Date:	10/16/02		Elevation :		8,800 msl						
Drilling Method:	4-Inch Hollow Ste	m Aueer	Weather:		Char Skies, Partly Sunny 60°F						
Development Company:	Kayenta Consultin	<u>e</u>			Sheht Breeze						
Date Development Started:	10/16/02		Date Development Compl	leted:	10/16/02						
Screen Intervals: 4ft. To 14 ft bgs			Weil Diameter:		2 Inch						
Depth of Well (L*):		<u>14_</u> ft.	Depth to Water Before Do	cvelopment (L ¹):							
Height of Water Column (L" - L'):											
Depth to Top of Sediment (L')		14ft_	Sediment Thickness (L" -	L ^ì):	Na_ft.						
Well Volume:		1.12 gal.									
Total Volume Pumped:		27_gal.									
Number of Well Volumes Pumped	(total volume pun	nped/well volume):	25+ volumes pumped on	10/16/02	0.16 gallons per foot on a 2-Inch Well						
	Monito	ring Well Sample	e Data: Well RLP-G	₹ W 4							
Date To	mp	рН	Cond	Gallons Purg	ed Observations						
	4.0 3.5	7.20 7.20	1385 1380	24 25	Slightly turbid Slightly turbid						
	3.7	7.20	1383	27	Slightly turbid						
* Sample collection continued after wel	development inchio	les well development p	urge volumes								
10/16/02 @ 1600					Sarople Collected						
-	<u> </u>	Lith	ology								
0-2 feet bgs Gravel fill	material										
	terials and cobble										
Presented By	Date		Checked By		Date						

CDPHE			Vini.		47						
			A A STORMAN MANANTANA								
Project Number: Rico Light Indus	trial Park	Project Name: Rico Light Industrial Park									
Well Number: RLP-GW5		Well Location: Rico Light Industrial Park									
Time / Date:	10/17/02		Elevation :	8,8	00 msl						
Drilling Method:	4-Inch Hollow Ste	m Auger	Weather:	<u>a</u>	ear Skies, Partly Sunny 60°F						
Development Company:	Kayenta Consultin	<u> </u>		Sli	ght Breeze						
Date Development Started:	10/17/02		Date Development Comple	eted: <u>10</u>	/17/02						
Screen bitervals: 18 ft. to 23 ft bgs			Well Diameter:	21	nch						
Depth of Well (L"):		ft_	Depth to Wajer Before De	velopment (L'):	<u>15</u> ⊴ft						
Height of Water Column (L" - L'):											
Depth to Top of Sediment (L1)		14ft.	Sediment Thickness (L"-	L'):	Na_ft.						
Well Volume:		_1.28 gal.									
Total Volume Pumped:		46 gal.									
Number of Well Volumes Pumped	(total volume pum	nped/well volume):	46 gallons purged on 10/1	7/02 0.1 W	l 6 gallons per fool on a 2-inch ell						
	Monito	ring Well Sample	Data: Well RLP-G	W5							
	mp	рН	Солф	Gallons Purged	Obaervations						
10/17/02 13 10/17/02 13	3.8	6.89 6.90	2620 2620	45 45.5	Slightly turbid Clear, Slightly turbid						
	3.7	6.91	2610	46	Clear						
* Sample collection continued after well	development includ	es well develojanent pi	irge volumes								
10/17/02 @ 1145					Sample Collected						
	<u></u>	Lithe	nlogy								
0-2 feet bgs Waste rock											
2-23 feet bgs Purple roas	ted tailings, wet			·							
											
Presented By	Date		Checked By		Date						

<u>ambererieszekorrakora</u>e DAMBAYAYND SANNIHAD arana samanna kak Project Number: Rico Light Industrial Park Project Name: Rico Light Industrial Park Well Number: RLP-GW6 Well Location: Rico Light Industrial Park 10/17/02 Elevation: 8,800 msl Time / Date: 4-Inch Hollow Stem Auger Weather: Clear Skies, Partly Sunny 60°F Drilling Method: Development Company: Kayenta Consultinn Shight Breeze 10/17/02 Date Development Completed: 10/17/02 Date Development Started: Well Diameter: 2 hich Screen Intervals: 12 ft. to 17 ft bgs Depth to Water Before Development (L1): Depth of Well (L*): <u>30</u> ft. 25 ft. Height of Water Column (L" - L1): 5 ft. Depth to Top of Sediment (Li) 30fL Sediment Thickness (L - L'): Na_ft. Well Volume: 0.8 gal. Total Volume Pumped: 8 gal. 0.16 gallons per foot on a 2-Inch Well 8+ volumespureed on 10/17/02 Number of Well Volumes Pumped (total volume pumped/well volume): Monitoring Well Sample Data: Well RLP-GW6 Cond Gallons Purged Observations Temp Date pН 6.49 10/17/02 13.1 4000 Slightly tmbid 3970 6.38 12.6 Clear, Slightly turisid 10/17/02 10/17/02 13.1 6.42 4110 * Purged dry total of 8 times, Collected sample on 9* recharge * Sample collection continued after well development includes well development purge volumes Sample Collected 10/17/02 @ 1645 Lithology Purple roasted tailings mixed with waste rock and river cobble 0-18 feet bgs Native Rock, Cobble 18-30 feet bgs Date Checked By Date Presented By

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e e proposition de la companie de la Reiranestemannaca Project Name: Rico Light Industrial Park Project Number: Rico Light Industrial Park Well Number: RLP-GW7 Well Location: Rico Light Industrial Park 10/17/02 Elevation: 8,800 ms1 Time / Date: Weather: Drilling Method: 4-Inch Hollow Stem Auger Clear Skies, Partly Summy 60°F Development Company: Kaveota Consulting Slight Breeze Date Development Completed: 10/17/02 10/17/02 Date Development Started: Well Diameter: 2 Inch Screen Intervals: 19 ft. to 24 ft bgs Depth to Water Before Development (Lt): Depth of Well (L"): 24 ft. <u> 19_</u>ft. Height of Water Column (L* - L'): Sft. Depth to Top of Sediment (Li) 24 ft. Sediment Thickness (L" - L1): Na ft. Well Volume: 0.8 gal Total Volume Pumped: 0.16 gallons per foot on a 2-inch Well 43+ volumes purged on 10/17/02 Number of Well Volumes Pumped (total volume pumped/well volume): Monitoring Well Sample Data: Well RLP-GW7 Gallons Purged Observatians Date Cond 15.5 6.51 1679 10/17/02 Slightly turbid 15.7 1719 10/17/02 6.51 СІсаг Sample collection continued after well development includes well development purge volumes

Checked By

Lithology

Sample Collected

Date

Date

Waste rock / river cobble

10/17/02 @ 1550

0-24 feet bgs

Presented By

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116	A DINK	0 2	设计 第		K D	V
	1 1 2 2 3	F-78-1	25 V V V V	34. 11. 12.	= 60 1.3	

Project Number: Rico Light Indus	trial Park	Project Name: Ric	o Light Industrial Park		
Well Number: RLP-GW8		Well Location: Ric	o Light Industrial Park		
Time / Date:	10/17/02		Elevahon:		8,800 msl
Drilling Method:	4-Inch Hollow Ste	m Aueer	Wealher:		Clear Skies, Partly Sunny 60°F
Development Company:	Kayenta Consultin	g			Slight Breeze
Date Development Started:	10/17/02		Date Development Completed:		10/17/02
Screen Intervals: 25 ft. to 30 ft bgs			Well Diameter:		2 Inch
Depth of Well (L*):	·		Depth to Water Before Devel	opment (L ^t):	<u>25_</u> ft.
Height of Water Column (L" + L'):		<u>5</u> ft			
Depth to Top of Sedhnent (L')	<u>30</u> ft.		Sediment Thickness (L* - L¹):		Na_ft.
Well Volume:		0.8 gal.			
Total Volume Pumped:		24 gal.			
Number of Well Volumes Pumped	(total volume pun	nped/well volume):	24+ volomes purged on 10/1	7/02	0.16 gallons per foot on a 2-Inch Well
	Monito	ring Well Sample	e Data: Well RLP-GW	78	
Date Te	mp	pH	Cond	Gallons Pur	
	3.0	6.46	2510	22	Clear, Slightly turbid
	2.9 2.5	6.58	2520 2520	23	Clear, Sbghtly turbid Clear, Shghtly turbid
* Sample collection continued after wel	development includ	des well development p	ourge volumes		
10/17/02 @ 1735					Sample Collected
		Lith	ology		
0-1 feet bgs Fill materia					
1-24 feet bgs Red purple	slimes, roasted taili	ngs, saturated			
24 - 30 feet bgs Native mai	erials, river cobble				
Presented By	Date		Cheeked By		Date

BORING B-I CONFIRME PEAK SPEIN SON SAMPLING UNITS SAMPLING UNITS SAMPLING COMPINING PEAK SPEIN SON SAMPLING UNITS SAMPLING SURFACE ELEVATION 8833 Z STRENGTH TEST NESULTS OTHER DEPTH COORDINATES TYPE OF TEST SYMBOLS OESCRIPTION' 0 BROUNT FIPE TO COMISE SKNOT CARVEL UTTH SITT HERIUM DENSE GRANNES WITH LENSES OF SILTY SAAR AND SANDY SILT T 15 SPT CHEORS AMET AND GHARES 10-SPT 7 FILL GHPOES LODSE TO HPDIUM WENSE CIUMES LOOSE SPT 15 GRADES WITH MIRE ENGIEL AND MEDIUM DENSE 20 V. 14 TS* ΒÉ DARK BROWN EO BLACE SILTY GRAVEL VITH SAND, ANDIEM DERSE 28 Ď ш BOWER SILTY FIRE TO CORRSE SAND HITH SOME GRAVEL MEDIUM DEMSC SI SPT. 50 ENONG SANDT MPAVEL, DENSE TO VEET DENSE AUGER REHISAL AT 33 FEET 50/5- SPT a ARRING COMPLETER AT US.S FECT AR 6/3/81 METER ENCOUNTERED AT 21.5 FIET DH C/3/8/ 35 40 45 50 55 60 65

RET

- INDICATIS UNDISTURSED SAMPLE
- INDICATES OF STIMBED SAMPLE
- I INNICATES SAMPLING ATTEMPT WITH NO RECOVERT
- INDICATES STANDARD PENETRATION TEST SAMPLE
- P IN BLUM COUNT COLLAN INDICATES SAMPLER NYDMPELICALLY PUSHED

SAMPLE TYPE

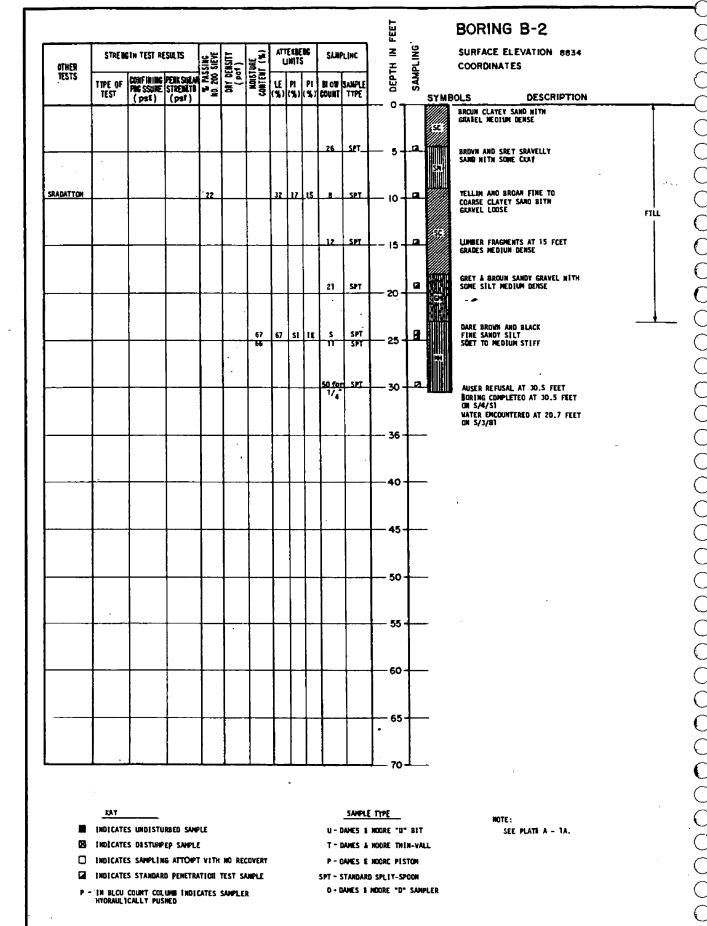
- U DAMES & HOCOE "U" SIT
- T DAMES I HEORE THIM-MALE
- P GAMES & MOORE PISTON
- SPT STANDARD SPLIT-SPOOM
- D-IMPES E NOORE "D" SAMELEE

NOTE:

- 1. THE SOIL EIMOITIONS ARE DESCRIBED IN ACCOMMNCE VITH THE UNIFIED SOIL CLASSIFICATION STSTEN, PLATE A-3.
- I. SLOM COUNT MAS BEEN TAKEN AS THE MURRER OF DLOWE REQUIRED TO DRITE A SAMPLER TO CHE-FOOT MONITIRATIC USING A 140 POUND UEIGHT FALLING-3D INDIES.

LOG OF BORING

DAMES B MOORE



FILE ANACONDA RICO CHOIC DOE - 1608

LOG OF BORING

DAMES 8 MOORE

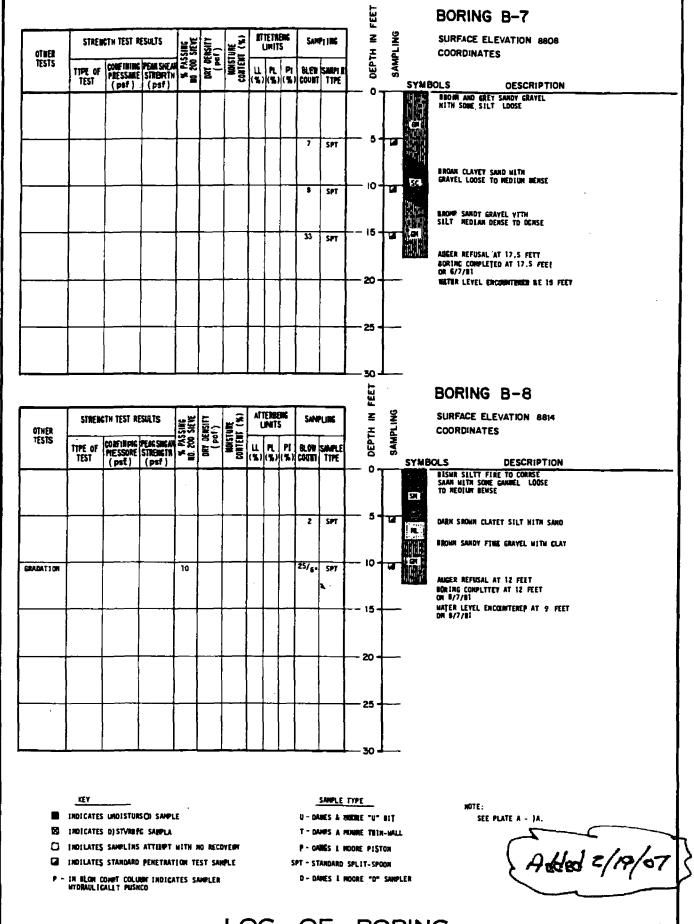
LOG OF BORING

D - ANMCS & MOORE "D" SAMPLER

IN BLOW COUNT COLUMN INDICATES SAMPLER HTDRAULICALLT PUSHED

DAMES 8 MOORE

THE ANACTION RICO OFFICE OF THE



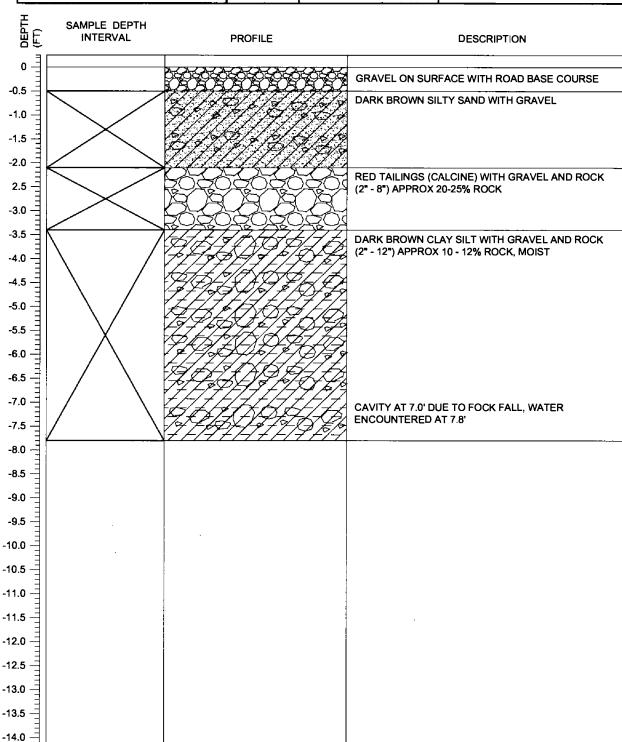
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LOG OF BORING

DAMES & MOORE

Test Pit Logs
- Anderson Engineering / SEH, 2008
- SEH, 2004
- SEH, 200°
- Anderson Engineering, 1996

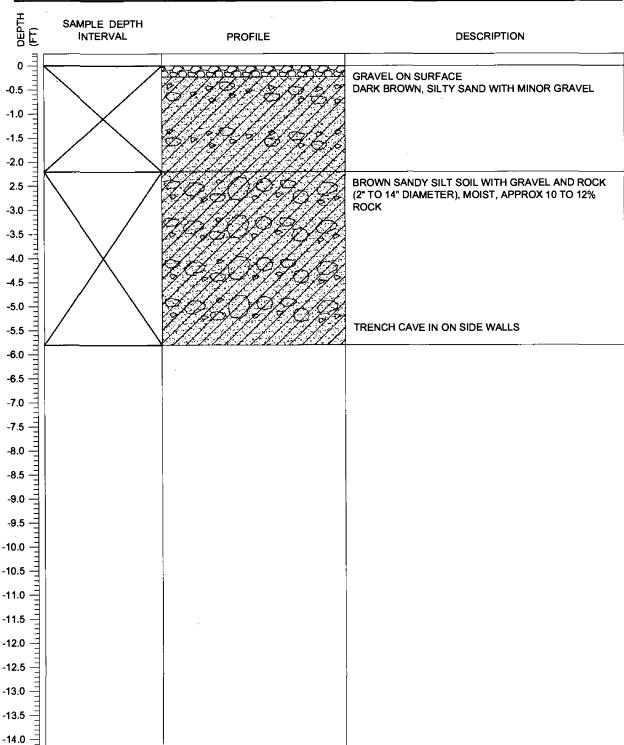
	TES	ST PIT LOG		PAGE 1 OF 1
SITE NAME: RICO	BORING		COORDI	
PROJECT: ST LOUIS PONDS	NUMBER: TP-1		OR LOC	
LOGGED BY: CS	SURFACE		GWL DE	PTH: 7.8' (ENCOUNTERED) PTH: (STATIC)
CHECKED BY: SDA	ELEVATION:		GWL DE	
DRILLING	HOLE	FLUID		
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		



TD = 7.8' NOTES: PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL

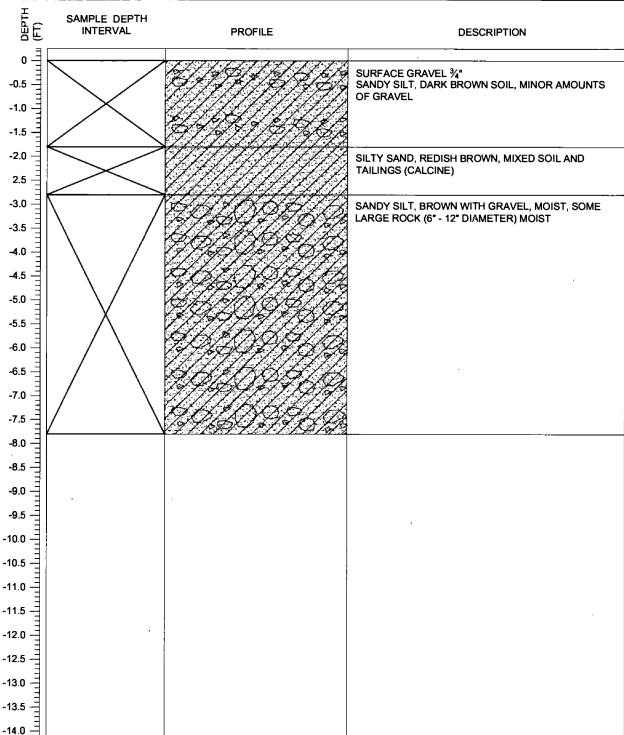


	TE	TEST PIT LOG		PAGE 1 OF 1		
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: T	P-2		DINATES LAT: 37.7063 CATION: LON: -108.0321		
LOGGED BY: CS	SURFACE	SURFACE		EPTH: N/A (ENCOUNTERED) EPTH: (STATIC)		
CHECKED BY: SDA	ELEVATION:	ELEVATION:				
DRILLING	HOLE	FLUID		DATE STARTED: 10/10/08		
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		DATE COMPLETED: 10/10/08		



TD = 6.0° NOTES: DID NOT CONTINUE DUE TO TRENCH CAVE IN ON SIDE WALLS X = SAMPLE, BACKFILLED AND COMPACTED

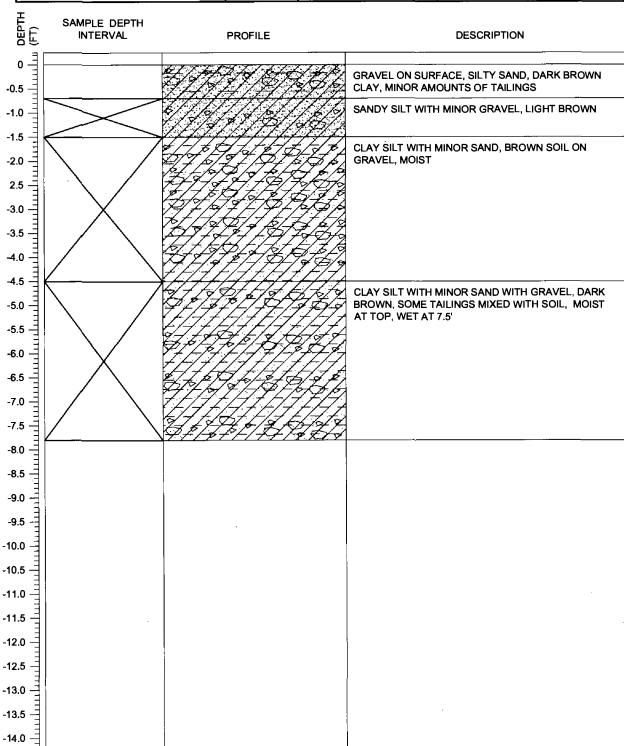




TD = 7.8' NOTES: NO WATER, TEST PIT BACKFILLED, COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF INTERVAL



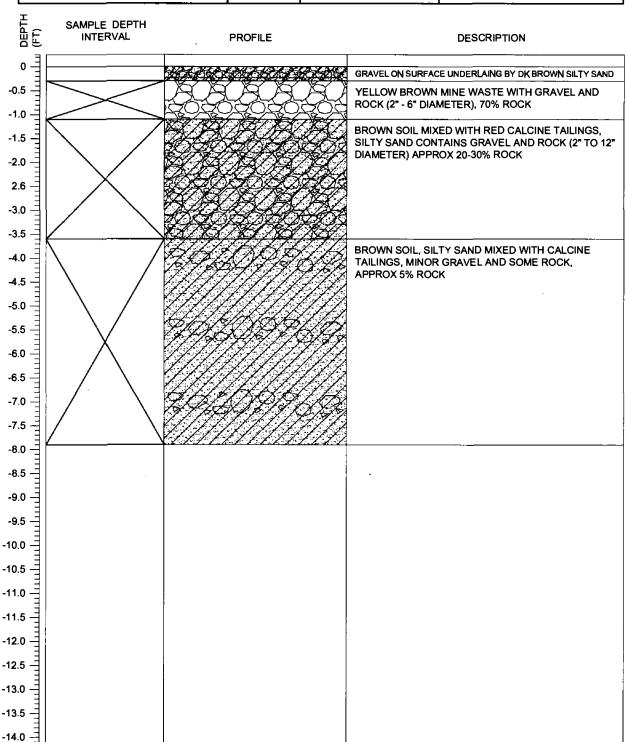
	T.	BORING COORD OR LOCAL SURFACE ELEVATION: GWL D		PAGE 1 OF 1		
SITE NAME: RICO PROJECT: ST LOUIS PONDS					LAT: 37.7054 LON: -108.0312 (ENCOUNTERED) (STATIC)	
LOGGED BY: CS CHECKED BY: SDA				PTH: 7.8' PTH:		
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A		DATE STARTED: 10/10/08 DATE COMPLETED: 10/10/08		



TD = 7.8' NOTES: WATER; BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



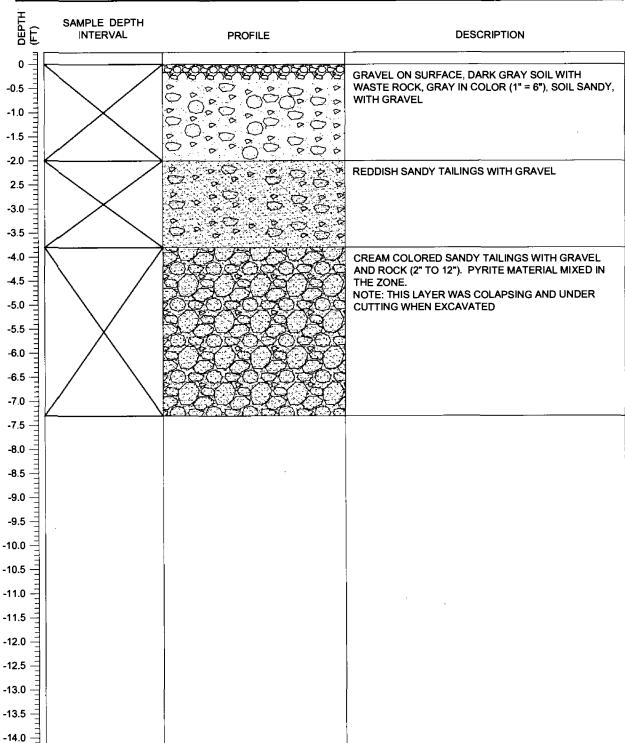
	TE	ST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: TP	-5	COORDI OR LOC		LAT: 37.7054 LON: -108.0305
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: N/A (ENCOUNTERE GWL DEPTH: (STATIC)		(ENCOUNTERED) (STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			RTED: 10/13/08 PLETED: 10/13/08



TD = 7.9' NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



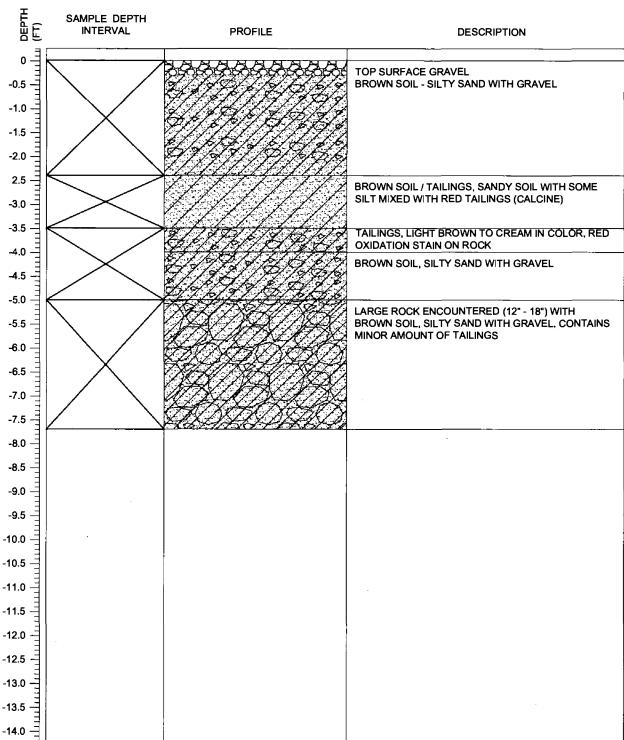
	TI	EST PIT LOG			PAGE 1 OF 1	
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: T	P-6	COORDII OR LOCA		LAT: 37.7041 LON: -108.0311	
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: N/A GWL DEPTH:		(ENCOUNTERED) (STATIC)	
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A	1.		RTED: 10/9/08 MPLETED: 10/9/08	



TD = 7.3' NOTES: NO WATER, PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



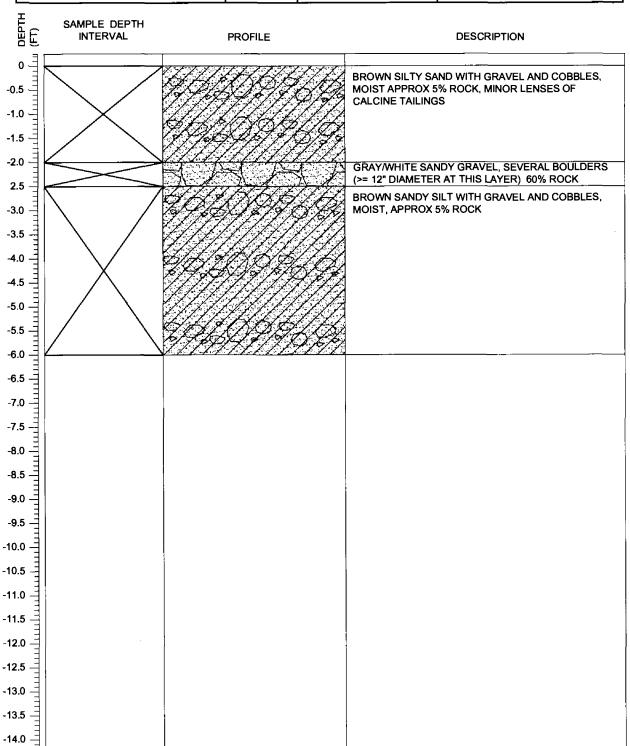
	TE	ST PIT LOG		Р	AGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: T	BORING NUMBER: TP-7		ATES FION:	LAT: 37.7040 LON: -108.0304
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:				(ENCOUNTERED) (STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			TED: 10/9/08 LETED: 10/9/08



TD = 7.7' NOTES: NO WATER ENCOUNTERED, PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



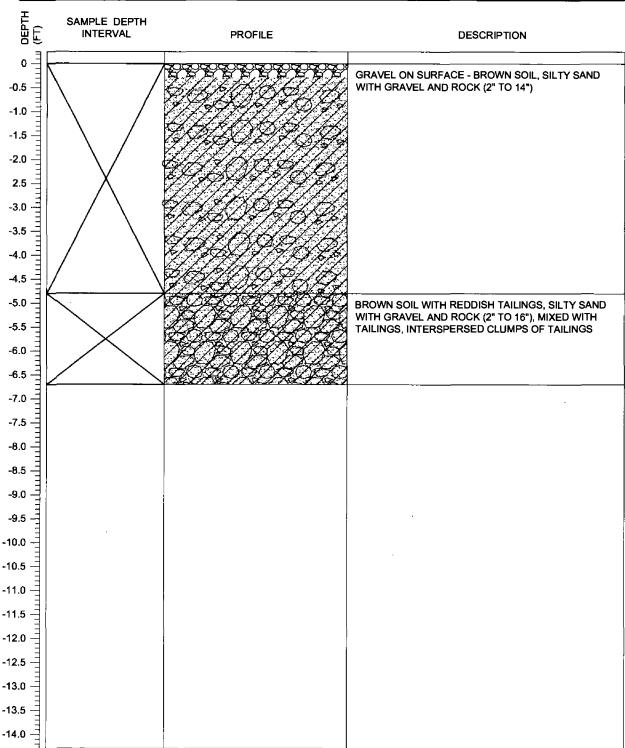
	TE	EST PIT LOG		PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: T	P-8	COORDI OR LOC	
LOGGED BY: CS	SURFACE	SURFACE		PTH: N/A (ENCOUNTERED) PTH: (STATIC)
CHECKED BY: SDA	ELEVATION:	ELEVATION:		
DRILLING	HOLE	FLUID		DATE STARTED: 10/14/08
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		DATE COMPLETED: 10/14/08



TO = 6.0° NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



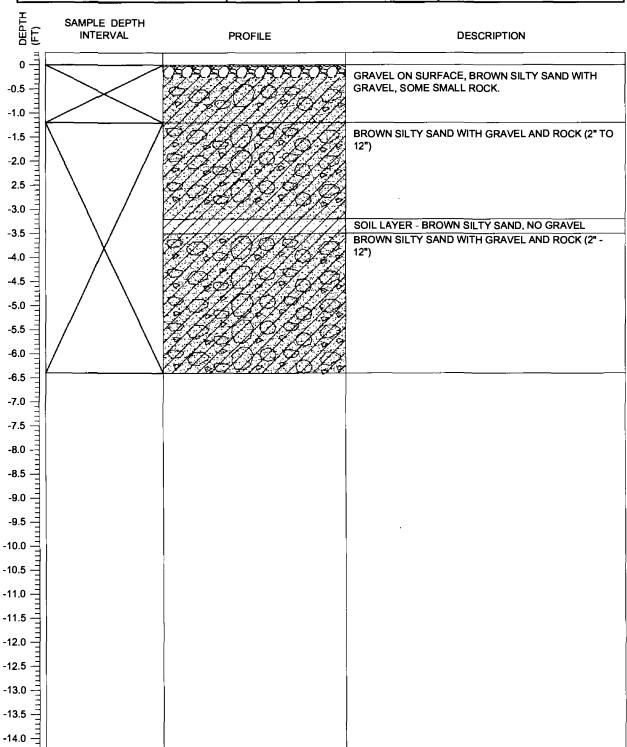
	TE	ST PIT LOG		PAGE 1	I OF 1	
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: TP	BORING NUMBER: TP-9		COORDINATES LAT: 37.70 OR LOCATION: LON: -108.		
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:			GWL DEPTH: 6.7' (ENCOUNTERE (STATIC)		
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A	-	DATE STARTED: DATE COMPLETE		



TD = 6.7' NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF INTERVAL



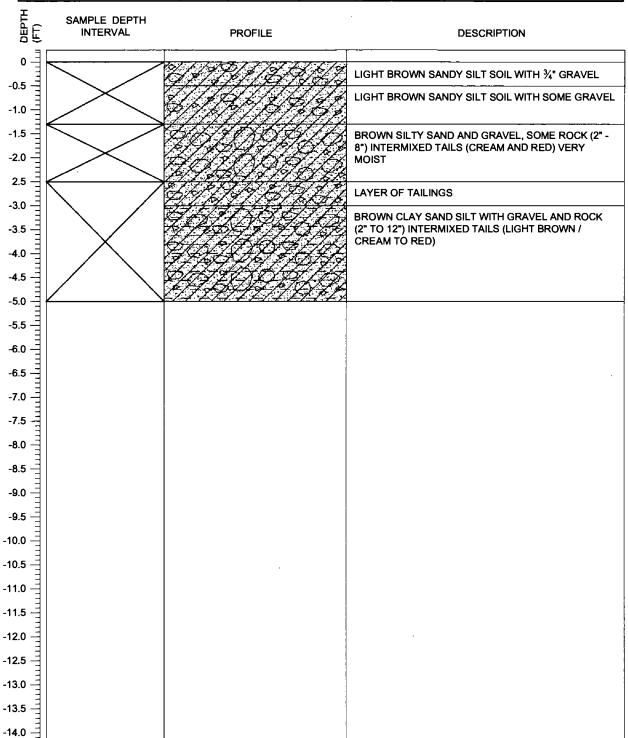
	T	EST PIT LOG	_	PAGE 1 OF 1	
SITE NAME: RICO	BORING	TP-10	COORDINATES	LAT: 37.7025	
PROJECT: ST LOUIS PONDS	NUMBER:		OR LOCATION:	LON: -108.0305	
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: 6.4' (ENCOUNTERED) GWL DEPTH: (STATIC)		
DRILLING	HOLE	FLUID		ARTED: 10/9/08	
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		MPLETED: 10/9/08	



TD = 6.4' NOTES: PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



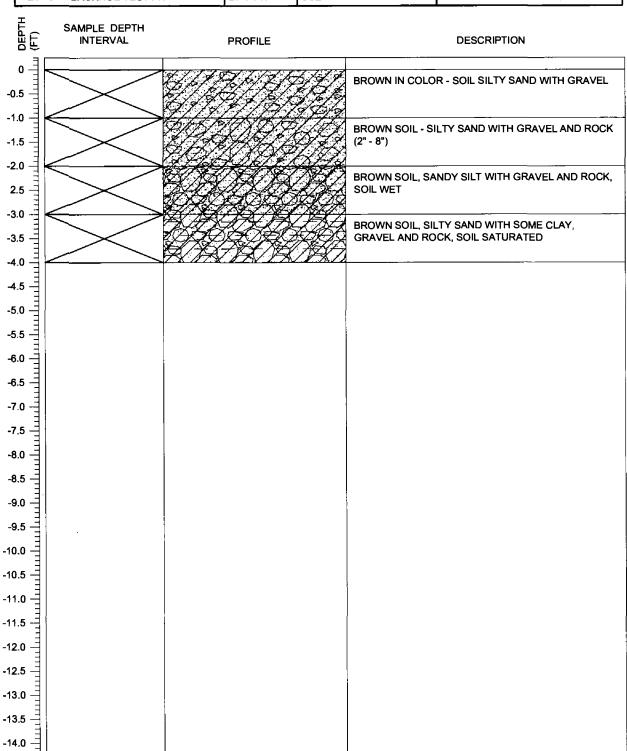
	TES	ST PIT LOG		PAGE 1 OF 1	
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: TP-	-11,	COORDI OR LOC		
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: 4.2' (ENCOUNTERED) GWL DEPTH: (STATIC)		
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA; PIT	FLUID USED: N/A		DATE STARTED: 10/9/08 DATE COMPLETED: 10/9/08	



TD = 5.0' NOTES: PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



.	T	EST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO	BORING	BORING		COORDINATES OR LOCATION:	
PROJECT: ST LOUIS PONDS	NUMBER: 1	NUMBER: TP-12			
LOGGED BY: CS	SURFACE	SURFACE		GWL DEPTH: 3.4' (ENCO) GWL DEPTH: (STATIO	
CHECKED BY: SDA	ELEVATION	ELEVATION:			
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			ARTED: 10/9/08 MPLETED: 10/9/08

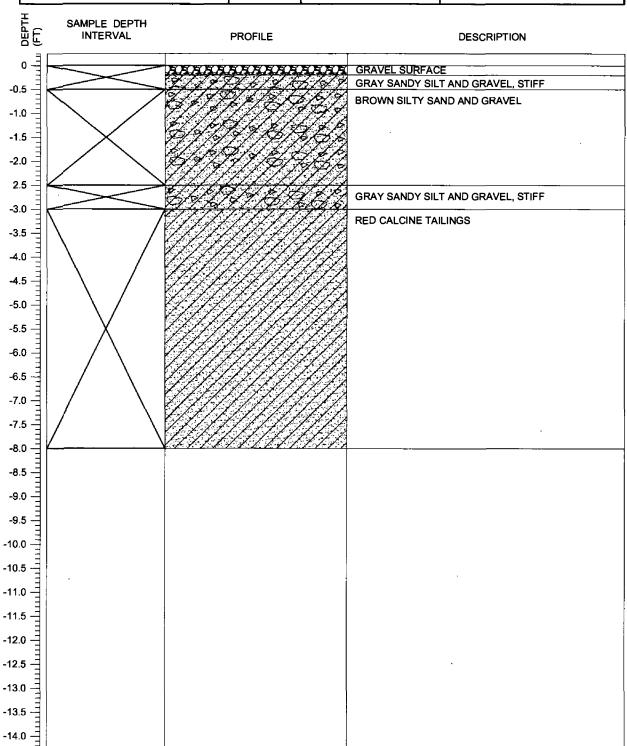


TD = 4.0' NOTES: PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



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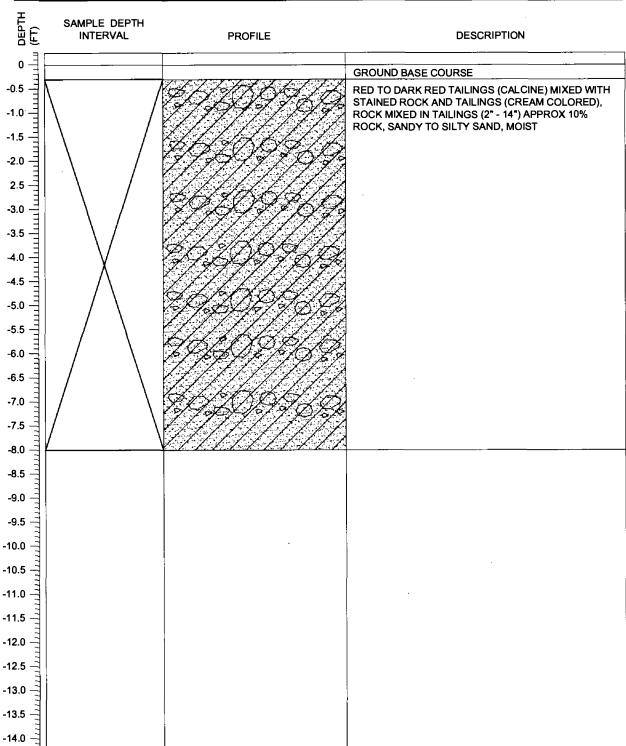
	TE	ST PIT LOG	PAGE 1 OF 1
SITE NAME: RICO	BORING	P-13	COORDINATES LAT: 37.7065
PROJECT: ST LOUIS PONDS	NUMBER: T		OR LOCATION: LON: -108.0306
LOGGED BY: KC CHECKED BY: SDA	SURFACE ELEVATION:		GWL DEPTH: 0' NG (ENCOUNTERED) WATER (STATIC) GWL DEPTH:
DRILLING	HOLE	FLUID	DATE STARTED: 10/14/08
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A	DATE COMPLETED: 10/14/08



TD = 8.0' NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



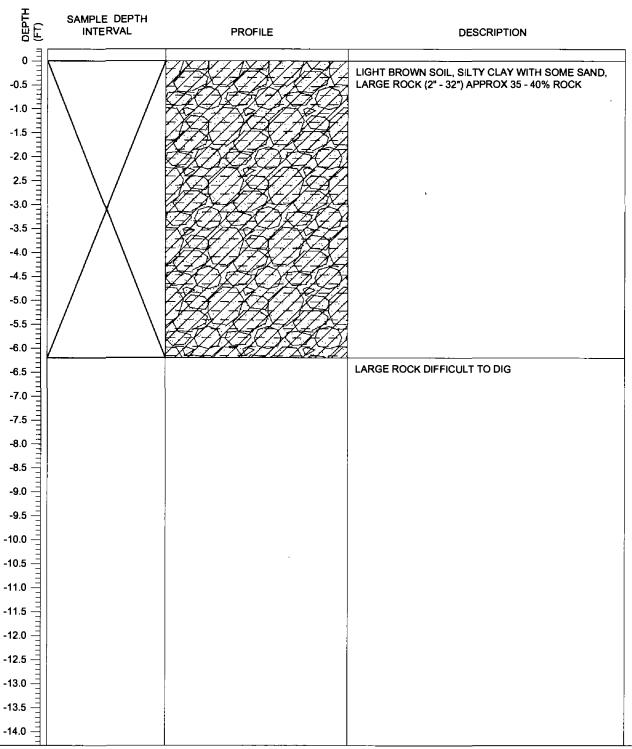
	Т	EST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: 1	ΓP-14	COORD OR LOC		LAT: 37.7069 LON: -108.0312
LOGGED BY: CS	SURFACE	SURFACE		GWL DEPTH: N/A (ENCOUNTE GWL DEPTH: (STATIC)	
CHECKED BY: SDA	ELEVATION	ELEVATION:			
DRILLING	HOLE	FLUID		DATE STARTED: 10/10/08	
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		DATE COMPLETED: 10/10/08	



 $TD = 8.0^{\circ}$ NOTES: NO WATER, BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL

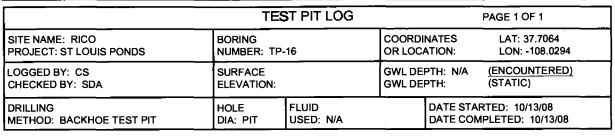


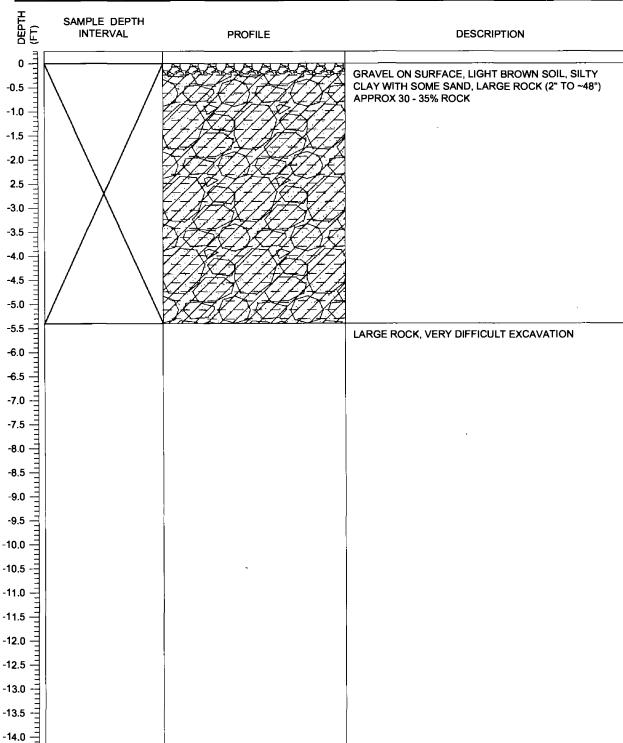
	TE	ST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER: TP	-15	COORD OR LOC		LAT: 37.7054 LON: -108.0292
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION:			PTH: N/A PTH:	(ENCOUNTERED) (STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			RTED: 10/13/08 MPLETED: 10/13/08



TD = 6.2' NOTES: TP 15 AND 16 SIMILAR SOIL PROFILES; TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



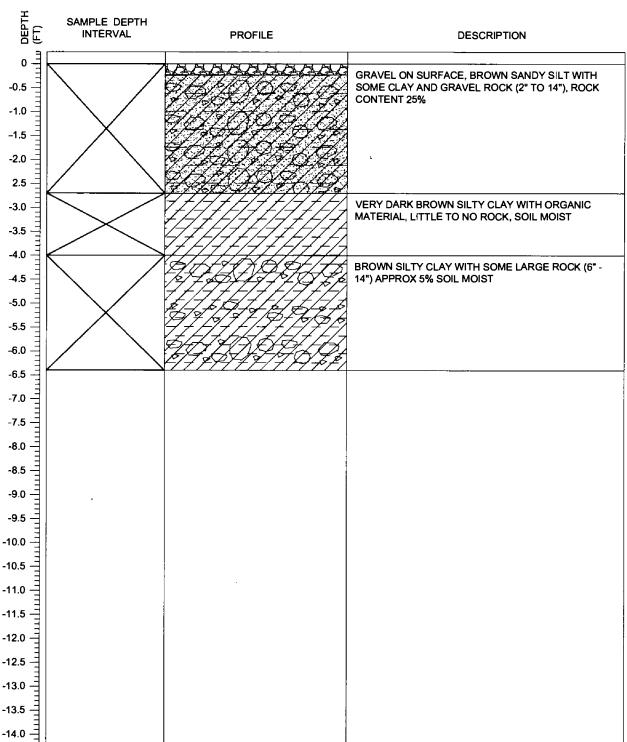


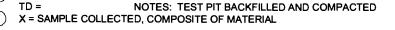


TD = 5.4' NOTES: TP-16 AND 15 SIMILAR SOIL PROFILES; TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



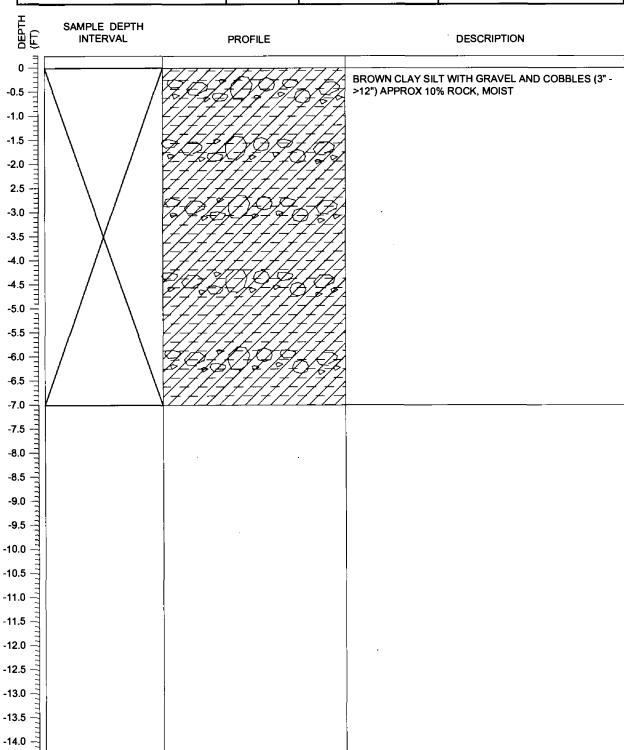
	TE	TEST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO	BORING	BORING		COORDINATES LAT: 37.7	
PROJECT: ST LOUIS PONDS	NUMBER: T	NUMBER: TP-17		OR LOCATION: LON: -10	
LOGGED BY: CS	SURFACE	SURFACE		PTH: N/A	(ENCOUNTERED)
CHECKED BY: SDA	ELEVATION	ELEVATION:		PTH:	(STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			RTED: 10/13/08 MPLETED: 10/13/08







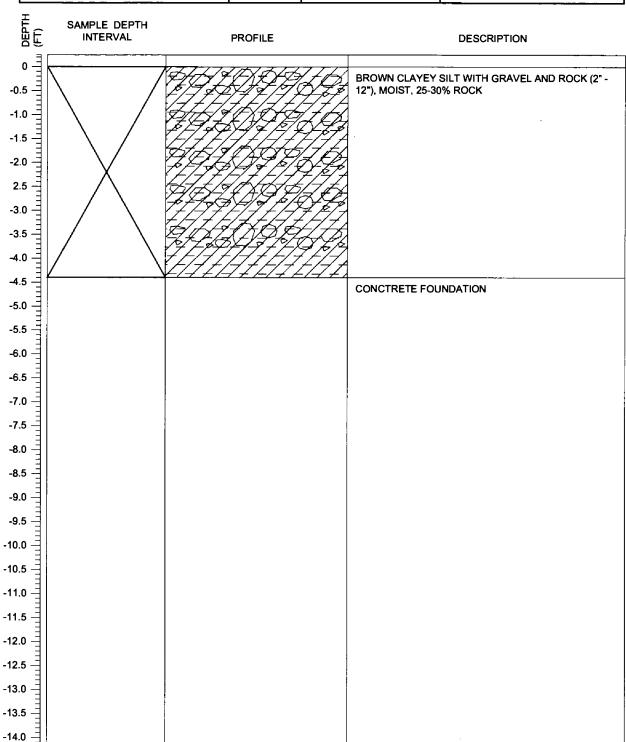
	Т	EST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO	BORING	-		INATES	LAT: 37.7074
PROJECT: ST LOUIS PONDS	NUMBER:			CATION:	LON: -108.0299
LOGGED BY: KC	SURFACE	GWL DEPTH: N/A			(ENCOUNTERED)
CHECKED BY: SDA	ELEVATION	GWL DEPTH:			(STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A	<u> </u>	1	RTED: 10/14/08 MPLETED: 10/14/08



TD = 7.0' NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL

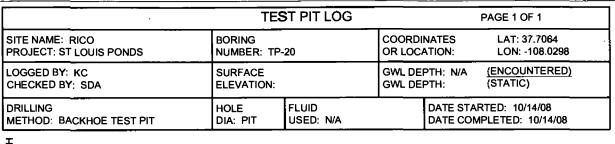


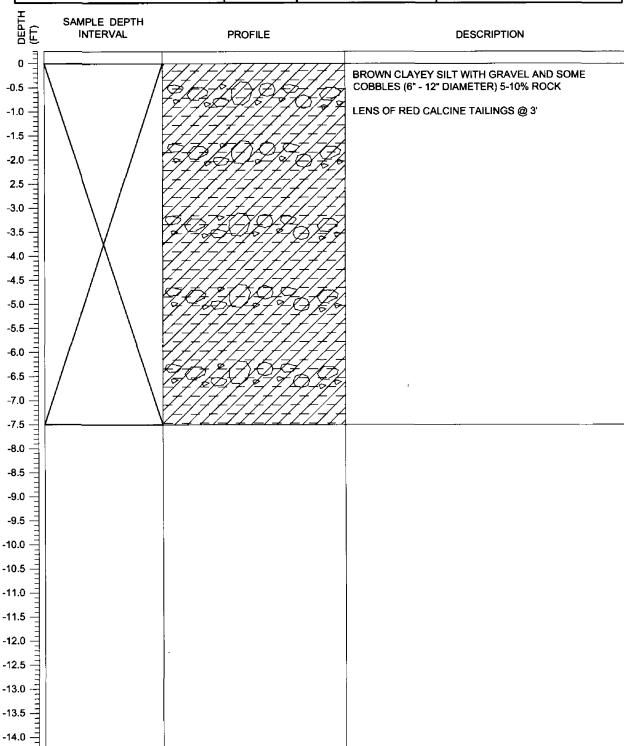
	TE	TEST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO	BORING			NATES	LAT: 37.7069
PROJECT: ST LOUIS PONDS	NUMBER: TP			ATION:	LON: -108.0298
LOGGED BY: KC	SURFACE			PTH: N/A	(ENCOUNTERED)
CHECKED BY: SDA	ELEVATION:			PTH:	(STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT				RTED: 10/13/08 PLETED: 10/13/08







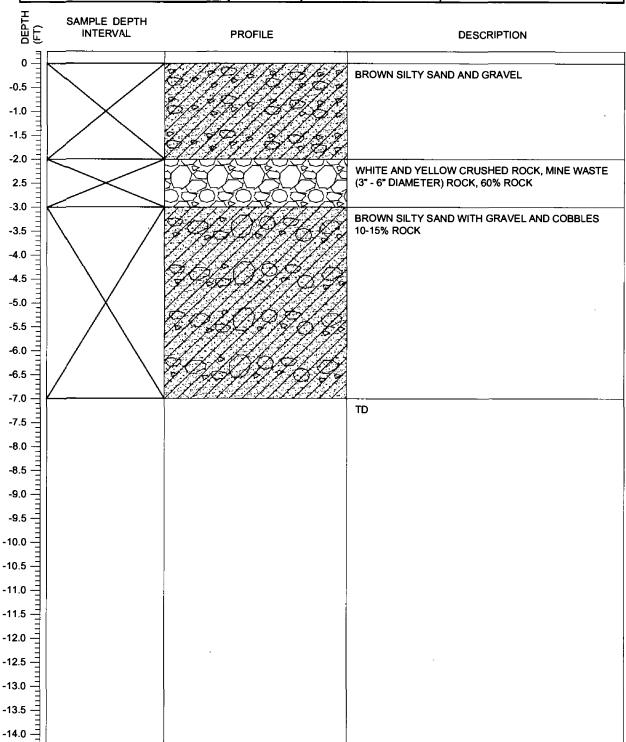




TD = 7.5' NOTES: PIECE OF CONCRETE FOUNDATION WITH END OF PIT AT 2' DEEP, METAL DEBRIS FOUND IN ZONE CONTAINING THE CALCINE TAILINGS. TEST PIT BACKFILLED AND COMPACTED. X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



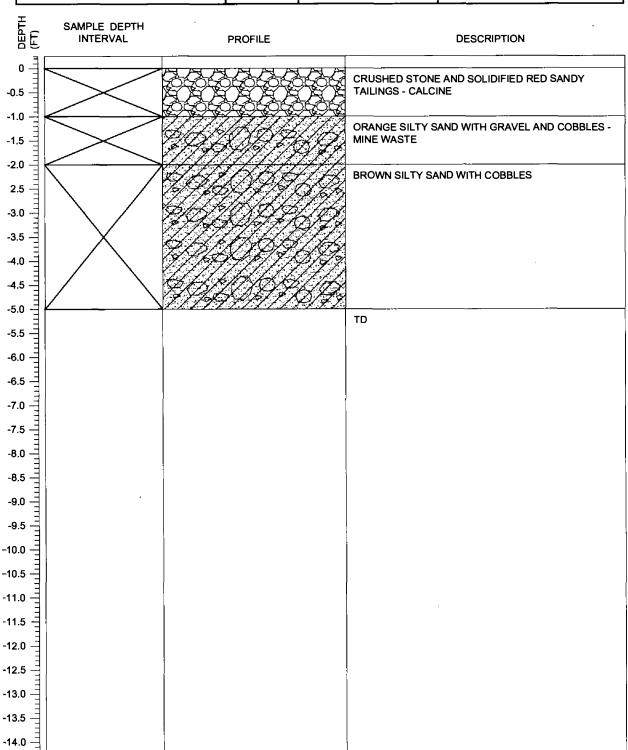
	TE	TEST PIT LOG			PAGE 1 OF 1		
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING COORD NUMBER: TP-21 OR LOC			LAT: 37.7070 LON: -108.0302			
LOGGED BY: KC CHECKED BY: SDA	SURFACE ELEVATION:		GWL DE		(ENCOUNTERED) (STATIC)		
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			TED: 10/13/08 LETED: 10/13/08		



TD = 7.0' NOTES: TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



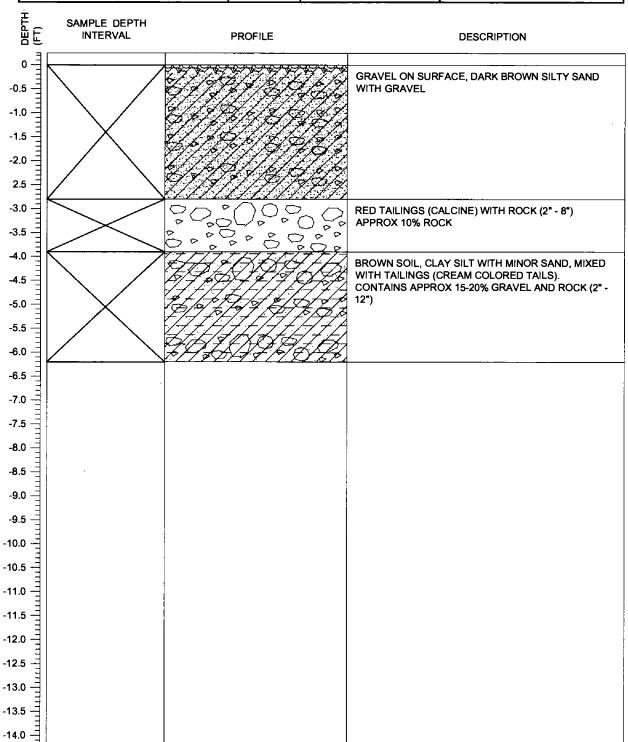
	TI	ST PIT LOG		PAGE 1 OF 1	
SITE NAME: RICO	BORING	BORING		DINATES LAT: 37.7075	
PROJECT: ST LOUIS PONDS	NUMBER: T	NUMBER: TP-22		CATION: LON: -108.0305	
LOGGED BY: KC/CS CHECKED BY: SDA	SURFACE ELEVATION			EPTH: N/A (ENCOUNTERED) EPTH: (STATIC)	
DRILLING	HOLE	FLUID		DATE STARTED: 10/13/08	
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		DATE COMPLETED: 10/13/08	



TD = 5.0' NOTES: STEEL PIPE IN TRENCH RUNNING N/S AT 1.2' DEEP. PIPE 9" DIAMETER. TEST PIT BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



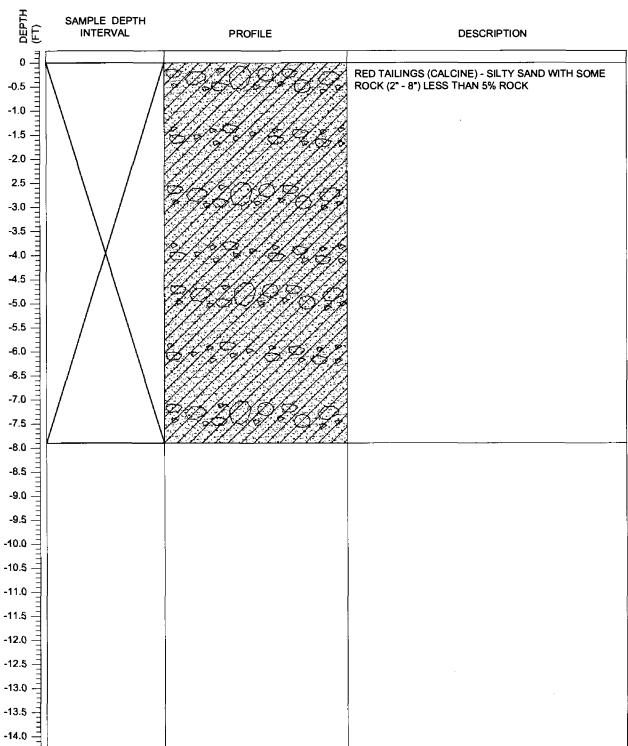
	TES	ST PIT LOG		PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	· · · · -		COORDI OR LOC	
LOGGED BY: CS	SURFACE			PTH: N/A <u>(ENCOUNTERED)</u>
CHECKED BY: SDA	ELEVATION:			PTH: (STATIC)
DRILLING	HOLE	FLUID		DATE STARTED: 10/10/08
METHOD: BACKHOE TEST PIT	DIA: PIT	USED: N/A		DATE COMPLETED: 10/10/08



TD = 6.2' NOTES: NO WATER. BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



	Т	EST PIT LOG			PAGE 1 OF 1
SITE NAME: RICO PROJECT: ST LOUIS PONDS	BORING NUMBER:	ГР-24	COORDI OR LOCA		LAT: 37.7082 LON: -108.0317
LOGGED BY: CS CHECKED BY: SDA	SURFACE ELEVATION	l:	GWL DEPTH GWL DEPTH		(ENCOUNTERED) (STATIC)
DRILLING METHOD: BACKHOE TEST PIT	HOLE DIA: PIT	FLUID USED: N/A			ARTED: 10/10/08 MPLETED: 10/10/08



TD = 7.9' NOTES: BACKFILLED AND COMPACTED X = SAMPLE COLLECTED, COMPOSITE OF MATERIAL



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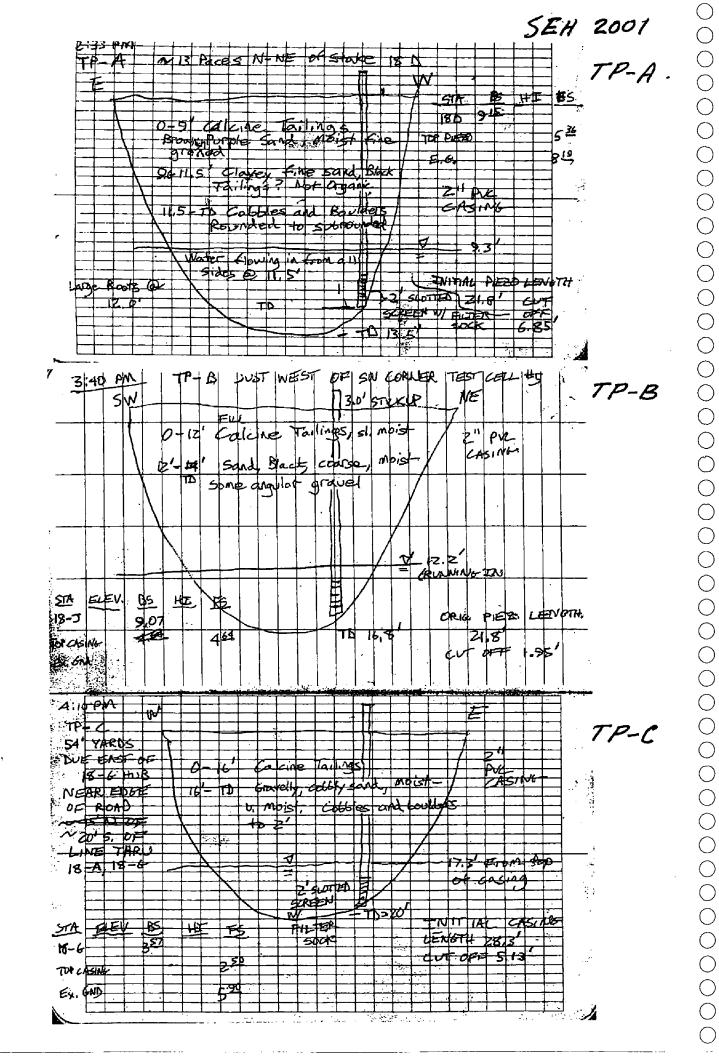
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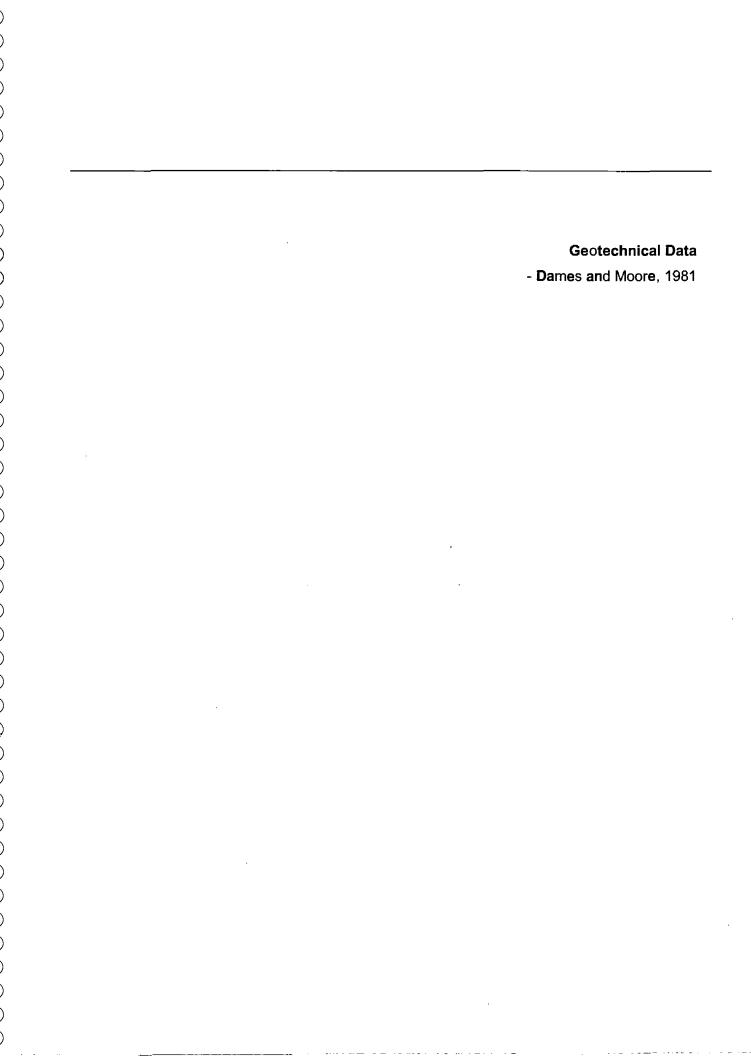


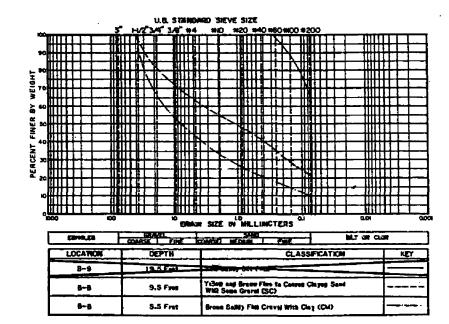
SAMI	SAB Lake City, BUS (BO1) 97: FAX (BO1) 97: PUNO METHO	D South, Suill 100 , Clan S4119 7-8222 2-823S	ARCO RICO RECLAMATION BORROW MATERIAL	BORING NO. APB-1 SHEET / OF / DATE STAFFIED: 10 APR 96 DATE COMPLETE: NO APR 96 TOTAL DEPTH: 3.0. SLIRFACE ELEV: 8885 ** Y: N 26680 E. 20135
SAMPLE NO,	SAMPLE DEPTH (I	SYMBOL	DESCR	IPTION
APB-1	7-3		Sizes, Scattered. 03-3.0 FT Brown Soil w/ Texture Sc-CL	•

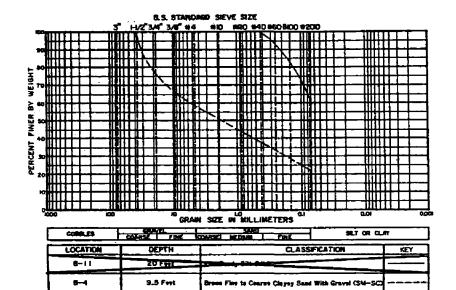
BORING NO. APB-2 SMET / OF /											
SAMPLING METHOD: BALLAGES SAMPLING METHOD: BALLAGES BORROW MATERIAL LOGGED BY: J. MARTINEAU DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION SHEET / O T D DATE STARTED: 10 APR 1996 TOTAL DEFTH: 3.0' SUPPACE BLEV: 8853 N 26710 E 19940 DESCRIPTION DESCRIPTION APB- 2 O 1.0' Root 2.NE NO NOTICABLE ORGANICS Color Feetile-Blown To yellon-2700M (imonite + Hematitie) FINES SAMPLY Sith And Clay ROCKS MOSHY Sub-angular LANCER ROCK INGREASING PERCENTAGE LANCER ROCK INGREASING PERCENTAGE LANCER SIZE 1.5 × 1.2 × 1.7 Two others over 1' Screen Size				BORING NO. APB							
BAPPING METHOD: BALK HOS SAMPLING METHOD: BALK HOS LOGGED BY: J. MARTINEAU BORROW MATERIAL BORROW MATERIAL DESCRIPTION DESCRIPTIO	Sa	it Lake City, Ulah	84118	ARCO	SHEET / OF /						
BORROW MATERIAL TOTAL DEFTH: 3.01 SURFACE ELEV: 8853 N 26710 E 199A0 DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION APB COLOR FIRST THE TOTAL DEFTH: 3.01 SURFACE ELEV: 8853 N 26710 E 199A0 DESCRIPTION				DIGO DECLAMATION	DATE STARTED: 10 APR 1996						
DESCRIPTION DESCR	SAMPLING	METHOD:	BALKHOS	HICO RECLAMATION							
DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION DESCRIPTION Limenitie Tilematitie Fines sample sith and clay rocks Mostly Sub-angular Color Redish Blown To Yellon - 270 mm. (Limenitie Tilematitie) Fines sample sith And clay rocks Mostly Sub-angular Color Redish Sub-angular Color Redish Sub-angular Color Redish Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size				DODDOM ATERIA	TOTAL DEPTH: 3.0 1						
DESCRIPTION DESCR				BORROW MATERIAL							
DESCRIPTION DESCR	LOGGED B	iy: J. Mar	rtineau		N 26710 E 199A0						
APB- 2 O-1.0' Root Zine No Noticable Organics Color Redrich Blown to yellow - 270 mm. (Limonitic + Hematitiz) FINES SAMOY SULT AND CLAY ROCKS Mostly Sub-angular Ind' - 3.0' Similar to Above Largest Size 1.5 x 1.2 x 1.7 Two others over 1' Screen Size											
APB- 2 O-1.0' Root Zine No Noticable Organics Color Redish-Blown To yellow-270wn. (Limonitis + Hematitis) FINES SAMOY Silt AND CLAY ROCKS Mostly Sub-angular I.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size	. ₹				•						
APB- 2 O-1.0' Root Zine No Noticable Organics Color Redrich Blown to yellow - 270 mm. (Limonitic + Hematitiz) FINES SAMOY SULT AND CLAY ROCKS Mostly Sub-angular Ind' - 3.0' Similar to Above Largest Size 1.5 x 1.2 x 1.7 Two others over 1' Screen Size	S B	£	.	DESCRIPT	TION.						
APB- 2 O-1.0' Root Zine No Noticable Organics Color Fedrin- Blown To yellow- 2200010. (Limenitic + Hematitiz) FINES SAMON SILH AND CLAY ROCKES MOSHY Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE (LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size	P.E.	E		DE001							
APB- 2 O-1.0' Root Zine No Noticable Organics Color Fedrin- Blown To yellow- 2200010. (Limenitic + Hematitiz) FINES SAMON SILH AND CLAY ROCKES MOSHY Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE (LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size	AM M	bu	NYS SY								
APB- 2 O-1.0' Root 2NE NO NOTICABLE ORGANICS Color Feedish-Blown To Yellon-Effonn (Limonitic & Hematitic) FINES SANDY Silt AND CLAY ROCKS Mostly Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1.2 x 1.7 Two Others Over 1' Screen Size	0, 8										
APB- 2 O-1.0' Root 2NE NO NOTICABLE ORGANICS Color Feedish-Blown To Yellon-Effonn (Limonitic & Hematitic) FINES SANDY Silt AND CLAY ROCKS Mostly Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1.2 x 1.7 Two Others Over 1' Screen Size			ł								
APB- 2 O-1.0' Root 2NE NO NOTICABLE ORGANICS Color Readish-Blown To Yellon-Brown. (Limonitic & Hematitic) Fines sampy silt And clay Rocks Mostly Sub-angular 1.0' - 3.0' Similar to Above LARGER Rock INCREASING Percentage LArgest Size 1.5 x 1.2 x 1.7 Two Others Over 1' Screen Size					*						
Color Redish-Blown To Yellow-EDOWN. (Limenitic & Hematitic) FINES SANDY SILT AND CLAY ROCKS MOSHY Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PErcentage LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size		+0 F		0-10' 0-4 2-25	lin)						
(Limenitie & Hematitie) FINES SANDY SILT AND CLAY ROCKS MOSHY Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PErcentage (Largest Size 1.5 x 12 x 1.7 Two others over 1' Screen Size	1 1		of ct	NO N	OTICABLE ORGANICS						
Committed Hematitics FINES SANDY SILT AND CLAY ROCKS Mostly Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE LARGEST SIZE 1.5 x 1.2 x 1.7 Two Others Over 1' Screen SIZE			0 1 9W	COLON MAN DECIMA	To Yellow - ZZOWN.						
Rocks Mostly Sub-angular 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size	APB-		_	(Limonitie & Hemati	1(2)						
0-3' Similar to ABOVE LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1.2 x 1.7 Two Others Over 1' Screen Size	12		_	FINES SAMOY SILL A	ind clay						
0-3' SM-EL LARGER ROCK INCREASING PERCENTAGE LArgest Size 1.5 x 1 2 x 1.7 Two others over 1' Screen Size	-		09	Rocks Mostly Sub-angi	ular '						
0-3' SM-EL 1.0' - 3.0' SIMILAR TO ABOVE LARGER ROCK INCREASING PErcentage CArgest Size 1.5 x 12 x 1.7 Two Others Over 1' Screen Size	-	$+$ \cdot \vdash	-	-							
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	 	Engineering (075 We11 2100 Saa Laka City, BUS (801) 972 FAX (801) 972	South Sittle Utah S4119 -6222 -823S	100	ARCO RICO RECLAMATION	BORING NO. A P-13-3 SHEET / OF / DATE STANTED: 10 APR 96
•		BY: J.N			BORROW MATERIAL	DATE COMPLETE: (D APR 96 TOTAL DEPTH: 32 SURFACE ELEV: 8836
	SAMPLE NO. SAMPLE DEPTH (#)	ОЕРТН (₦)	SYMBOL	nsc	DESCRIPT	N 26400 É 20000
A	OB.	-1	Share Of the Office of the Strain	SW-SCL	Brown Soil-Rock Subangular Rock Ground Frozen Bro Hom 3" ULLE	L_ Consistent Top to Bottom70 2.5 Ft)

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	ANS	975	gineering Co 5 West 2100 S 5 Lake City, Ut	iouth, Suite 1	00	ARĆO	BORING NO. PPB-4									
		BU	S (801) 972-6 X [891) 572-8	222		DIGO DEGLAMATION	DATE STARTED: 10 APR 96									
	SA	MPLING	METHOD			RICO RECLAMATION	DATE COMPLETE: 10 APR 96	\sum								
			UISNE	4 021	۲ ا	BORROW MATERIAL	SURFACE ELEV: 8828	\asymp								
1	LO	GGED B	Y: J M	ARTIN	EAL		XE XU	K								
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 	SAMPLE NO.	SAMPLE DEPTH (DEPTH (ft)	SYMBOL	nsc	DESCRIPTIO	ON .	$\frac{10000}{1000}$								
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	180 m				GW-	mostly sand 4	grand. As soil Honzons	5								
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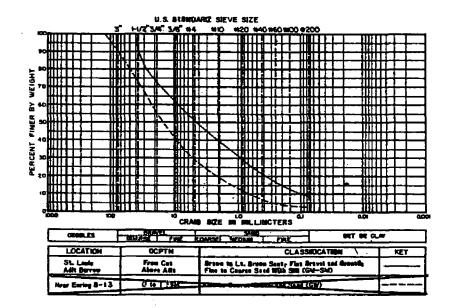


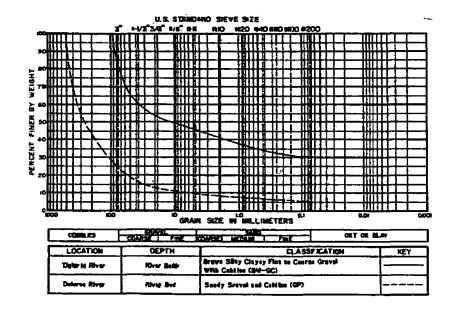


GRADATION CURVES

DAMES & MOORE

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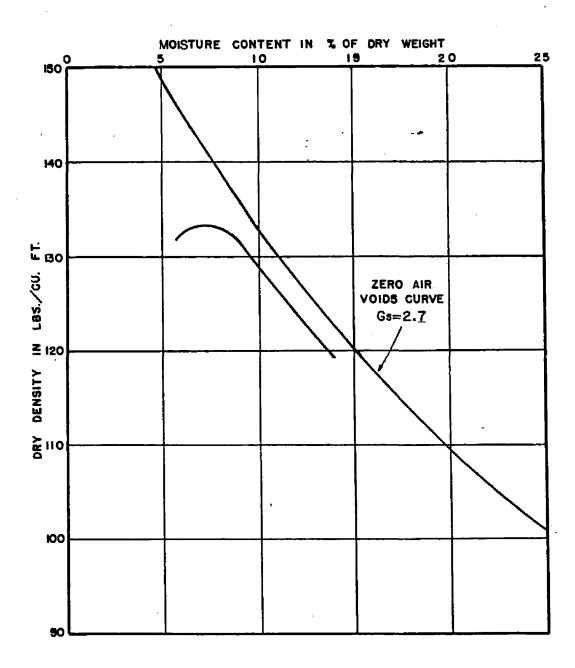


GRADATION CURVES

DAMES & MOORIE

M ATC 4 40

SAMPLE NO. — DEPTH — ELEVATION —
SOIL Sandy Gravel and Gravelly Sand (GM-SM)
LOCATION Cut Above St. Louis Adit
OPTIMUM MOISTURE CONTENT 7.5 Percent
MAXIMUM DRY DENSITY 133 Pounds Per Cubic Foot
METHOD OF COMPACTION ASTM D-1557 Method C



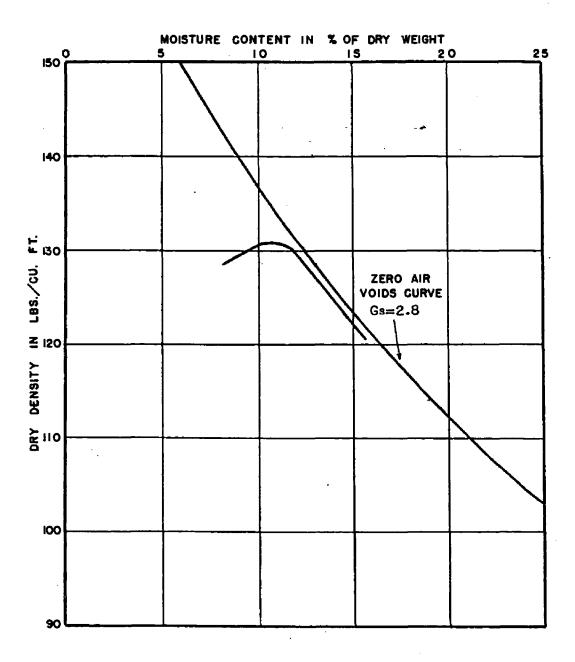
COMPACTION TEST DATA

DAMES & MOORE

PLATE A-5A

-E-1 2001 =9 1

SAMPLE NO DEPTH - ELEVATION -
SOIL Brown Silty Clavey Gravel (GM-GC)
LOCATION Dolores River Bank Material
OPTIMUM MOISTURE CONTENT Percent
MAXIMUM DRY DENSITY 131 Pounds Per Cubic Foot
METHOD OF COMPACTION ASTM D-1557 Method C



COMPACTION TEST DATA

DAMES & MOORE

APPENDIX C MICROPROBE RESULTS

Sample **EB-1** (22-24)

Sample is dominated by iron oxide, with abundant quartz, calcite, microcline and gypsum. Iron-poor clay is also found in minor amounts. Sphalerite, pyrite and galena are the dominant opaque minerals. Minor zinc and copper sulfate are observed.

Sources of:

Mn: sphalerite, calcite, clay

Cd: sphalerite Cu: copper sulfate

Sample EB-1 (18-20)

Sample is dominated by iron oxide, with abundant quartz, calcite, microcline and gypsum. Sphalerite and galena are the dominant opaque minerals. Minor zinc and copper sulfate and jarosite are observed.

Sources of:

Mn: sphalerite, iron oxides

Cd: sphalerite Cu: copper sulfate

Sample **EB-2** (7-9)

Sample is dominated by iron oxide and microcline with some quartz and gypsum. Galena is the dominant opaque mineral. Very minor sphalerite and calcite.

Sources of:

Mn: sphalerite Cd: sphalerite

Cu: ??

 \bigcirc

Sample EB-1 (10-12)

Sample is dominated by iron oxide and microcline with some quartz. Galena and sphalerite are the dominant opaque minerals. No gypsum was observed.

Sources of:

Mn: sphalerite Cd: sphalerite

Cu: ??

Sample EB-2 (5-7)

Sample is dominated by iron oxide and microcline with some quartz. Galena and sphalerite are the dominant opaque minerals but not very abundant. Minor gypsum was observed.

Sources of:

Mn: sphalerite Cd: sphalerite Cu: ??

APPENDIX D GROUNDWATER QUALITY DATA

Table D1
Groundwater Quality Data Summary

(all concentrations in mg/L)

Date	GW-1		GW-2		GW-3		GW-4		GW-5		GW-6		GW-7		GW-8	
Cadmium (dissolved)							-									
October 2002	0.002	U	0.002	U	0.002	C	0.002	U	0.002	U	0.015		0.007		0.002	
November 2004	0.0002	В					0.0011		0.0033		0.0004	С	0.009		0.0017	В
May 2005	0.0001	В	0.0015		0.0041		0.0001	U	0.0001	U			0.0373		0.0001	В
August 2005	0.0005	U	0.0012	В	0.0011	В	0.0001	U	0.0005	U	0.0005	U	0.0109		0.0002	U
January 2006	0.0001	U			0.001		0.0001	U	0.0005	U			0.0106		0.0001	В
July 2006	0.0001	U			0.0007		0.0001	U					0.0031		0.001	U
January 2007	0.0001	U			0.0004	В	0.0001	U	0.0001	υ	0.0001	U	0.006		0.0001	U
Iron (dissolved)														\exists		+
October 2002	0.16		1.1		0.095		0.3		4.6		630		0.18		41	
November 2004	0.07						0.23		1.42		8.79		2.78		178	
May 2005	0.01	U	0.22		0.01	В	0.45		1.92				1.31		7.09	
August 2005	0.02	U	0.15		0.02	U	0.36		7.57		151		0.13		15.3	
January 2006	0.11				0.02	В	1.24		3.44				9.09		21.9	T
July 2006	0.02	U			0.02	В	22.3						0.09		22.3	T
January 2007	0.02	U			0.02	U	0.28		3.95		153	-	8.79		18.3	
Manaanese [dissolved]											-				•	†
October 2002	0.0005	U	2.8		0.43		1.7		4.7		42		0.84		8.1	
November 2004	0.121						0.591		4.38		7.32		2.42		25.4	
May 2005	0.005	U	12.2		0.496		0.7		6.27				2.33		5.24	
August 2005	0.005	U	5.99		0.015	В	0.624		7.85		14.1		0.774		6.13	I
January 2006	7.1	i			16.5		24.8		37.6				39.3		53.5	
July 2006	0.005	U			0.271	Ĺ	7.38			L.			0.866		7.38	
January 2007	0.005	U	0.226		0.568	<u> </u>	3.79		20.2		19.2		1.83		6.85	
Zinc (dissolved)	<u> </u>															+
October 2002	0.012		0.064		0.38		0.073		7.1		4.7		0.67		0.22	
November 2004	0.01	U					0.05	В	7.75		0.23		2.23		9.44	
May 2005	0.01	U	0.22		0.78		0.02	В	17.3				6.51		0.18	
August 2005	0.01	U	0.07		0.31		0.03	В	30.3		17.7		1.83		0.22	
January 2006	0.009	В			0.127		0.505		3.51				2.01		6.45	
July 2006	0.01	U			0.09		0.16						0.44		0.16	
January 2007	0.01	U			0.11		0.01	В	6.29		14.6		1.43		0.17	

U = undetected

B= below practical quantiation level

Table D2

Minimum and Maximum Groundwater Concentrations
(all concentrations in mg/L)

		GV	V- 1	GW	!- 2	GW	/- 3	GV	V- 4	GW	/- 5	GV	V- 6	GV	V- 7	GV	V- 8
Parameter Parame	Analyte Type	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max
Alkalinity	Total	90	152	216	243	87	192	68	197	96	156	32	150	30	269	4	212
Arsenic	Dissolved	0.0001	0.017	0.001	0.017	0.0005	0.017	0.0004	0.0922	0.015	0.054	0.017	0.291	0.0003	0.017	0.0071	0.22
Arsenic	Total	0.0005	0.0378	0.0012	0.003	0.0005	0.0139	0.0011	0.213	0.071	0.152	0.174	0.429	0.0005	0.016	0.141	0.213
Barium	Total	0.058	0.058	0.067	0.067	0.017	0.017	0.039	0.039	0.019	0.019	0.033	0.033	0.015	0.015	0.03	0.03
Bicarbonate	Unknown	90	152	216	243	87	192	68	197	96	156	32	150	30	269	4	212
Cadmium	Dissolved	0.0001	0.002	0.0012	0.002	0.0007	0.0041	0.0001	0.002	0.0001	0.0033	0.0004	0.015	0.0031	0.0373	0.0001	0.002
Cadmium	Total	0.0001	0.0086	0.0013	0.0016	0.0013	0.0042	0.0001	0.0037	0.0002	0.0369	0.0003	0.0018	0.0036	0.0393	0.0002	0.0045
Calcium	Dissolved	48.2	82.7	215	351	156	224	224	505	573	632	502	502	271	404	405	505
Carbonate	Unknown	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Chloride	Total	0.5	1,3	1.2	2	0.5	5	0	10	0	0.8	0	0.5	0	5	0	5
Chromium	Dissolved	0.0001	0.0005	0.0002	0.0005	0.0001	0.0005	0.0001	0.0005	0.0001	0.0005	0.0005	0.0005	0.0001	0.0002	0.0001	0.001
Chromium	Total	0.0002	0.147	0.0005	0.003	0.0002	0.0015	0.0001	0.0043	0.0003	0.0092	0.0011	0.0011	0.0002	0.0014	0.0002	0.0073
Copper	Dissolved	0.0005	0.003	0.0012	0.004	0.0009-	0.003	0.0005	0.0074	0.0005	0.023	0.001	0.005	0.0012	0.0309	0.0005	0.003
Copper	Total	0.0006	0.3	0.0099	0.01	0.003	0.0057	0.0005	0.0099	0.002	0.657	0.009	0.016	0.0041	0.033	0.001	0.043
Cyanide	Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cyanide	Unknown	0.005	0.005	0.005	0.005	0	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0	0.005
Dissolved					0.000												
Oxygen	Dissolved	0.004	0.73	lo	Ιo	Ιo	0	0.0043	0.02	0.001	0.001	0.00097	0.00097	0.00065	0.46	0.0015	0.05
Hardness	Total	146	248	642	1030	458	678	662	1500	1610	1740	1490	1540	820	1260	1200	1630
Hydroxide	Unknown	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Iron	Dissolved	0.01	0.16	0.15	1,1	0.01	0.095	0.23	22.3	1.42	7.57	8.79	630	0.09	9.09	7.09	178
	Total																
Iron	Recoverable	0.05	0.16	0.93	2.14	0.02	0.99	1.6	32.8	6.54	46.1	33.9	168	0.48	14.8	17.5	245
Lead	Dissolved	0.0001	0.014	0.003	0.014	0.0001	0.014	0.0001	0.014	0.0005	0.138	0.0131	0.041	0.0033	0.0293	0.0003	0.048
Lead	Total	0.0001	0.524	0.008	0.0206	0.0005	0.0193	0.0001	0.0871	0.0015	4.43	0.136	0.194	0.0125	0.11	0.0042	0.632
Magnesium	Dissolved	6.2	10	25.5	37.6	16.5	28.8	24.8	58.1	37.6	51.5	56.5	70	34.6	61.4	44.5	126
Manganese	Dissolved	0.0005	0.121	2.8	12.2	0.015	0.496	0.505	7.38	3.51	7.85	7.32	42	0.774	2.42	5.24	25.4
Manganese	Total Recoverable	0.005	48.8	6.22	13.1	0.38	0.965	0.532	6.79	3.51	9.04	7.09	15.2	0.792	2.68	5.08	24.3
Mercury	Dissolved	0.00003	0.0002	0.00003	0.0002	0.00003	0.0004	0.00003	0.0002	0.00003	0.0002	0.00003	0.0002	0.00003	0.0038	0.00003	0.2
Nickel	Dissolved	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.03	0.05	0.46	0.01	0.05	0.0006	0.08
Nickel	Total	0.01	0.86	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.03	0.02	0.05	0.01	0.05	0.0006	0.02
Potassium	Dissolved	0.7	1.7	12.2	16.7	2.7	4.4	1.9	8.4	5.4	6	8.2	25.7	1.9	2.7	6.2	23.5
Selenium	Dissolved	0.0003	0.0007	0.0001	0.0002	0.0005	0.002	0.0001	0.0005	0.0001	0.0006	0.0002	0.0002	0.0004	0.0007	0.0001	0.0005
Selenium	Total	0.0003	0.001	0.0001	0.0001	0.0004	0.0018	0.0001	0.0001	0.0002	0.0002	0.0002	0.0002	0.0003	0.0008	0.0001	0.0005
Silver	Dissolved	0.00005	0.0003	0.0001	0.0003	0.00005	0.0003	0.00005	0.00005	0.00005	0.0003	0.0002	0.0003	0.00005	0.0001	0.00005	0.0002
Silver	Total	0.00005	0.00288	0.00017	0.0007	0.00005	0.0003	0.00005	0.0003	0.0001	0.0167	0.0001	0.0006	0.0001	0.00037	0.0001	0.0017
Sodium	Dissolved	2	4.4	7.9	13.1	3.8	5.7	9.6	11.7	11.2	15	4.2	11.6	6.7	10.3	10.3	10.9
Sulfate	Total	46.9	63.7	534	870	294	555	469	1180	1220	1580	1050	1910	542	1230	880	1190
TDS	Total	170	230	1060	1520	520	920	970	1950	2250	2550	2080	3170	1060	1960	1580	2910
TDS Calc.	Dissolved	160	200	932	1450	586	877	901	1910	2160	2330	2710	2710	1050	1730	1490	1950

Table D2 (continued) Minimum and Maximum Groundwater Concentrations (all concentrations in mg/L)

		GV	GW-1		GW-1		GW-1		GW- 2		GW- 3		GW-4		GW- 5		V- 6	GW-7		GW- 8	
Parameter Parameter	Analyte Type	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max				
TSS	Total	0	103000	6	20	0	26	6	56	5	472	16	82	5	104	5	224				
Zinc	Dissolved	0.01	0.012	0.064	0.22	0.09	0.78	0.02	0.16	6.32	30.3	0.23	17.7	0.44	6.51	0.16	9.44				
Zinc	Total	0.01	7.14	0.11	0.24	0.14	0.74	0.02	0.29	6.51	36.3	0.39	19.9	0.48	6.59	0.19	9.51				

Table D3
Groundwater Quality Data Summary

Dissolved Concentrations in µg/l (except as noted otherwise)

						_					by URS Start2							
Parameter (Date	DWCD Test Well	RA-GW-01 (USFS Well)	GW1	GW2	GW3	GW4	GW5	GW6	GW7	GW8	RA-GW-02 Total	RA-GW-02 Dissolved	RA-GW- 03* Total	RA-GW- 03* Dissolved	RA-GW- 04* Total	RA-GW- 04* Dissolved		
Samoled)	(8/5/2003)	(1996)	(10/2003)	(10/2003)	(10/2003)	(10/2003)	(10/2003)	(10/2003)	(10/2003)	(10/2003)	(10/2003)		(10/2003)	,	(10/2003)			
рН	7.05		7.4	7.3	6.4	7.2	6.9	6.4	6.5	6.5	7.67		6.44		7.44			
TDS	466,000										0.14		1.52	1	1.51			
Conductivity	i l										0.29		3.05		3.02			
Temp Deg F	1 1		51.8	53.4	51.8	56.7	56.5	55.4	60.1	55.4	46.1		109.9	[102.6			
Alkalinity	362,000															[[
Aluminum		8.0U									200∪	200U	200∪	200∪	200U	200U		
Antimony	U	3,0U									20U	20U	20U	20U	20∪	20U		
Arsenic	U	2.0U	17U	17U	17U	17U	17U ·	17U	17U	220	10∪	10U	37	37	25	25		
Barium	53	32.4B	58J	67J	17J	39J	19J	33J	15J	30J	130	130	100∪	100∪	100U	100U		
Berylium	U	1.0U									5U	5U	5.6	5.6	5U	5.4		
Cadmium	U	1.0U	2U	2U	2U	2U	2U	15	7	2U	5U	5U	5U	5U	5U	5U		
Calcium		76,600									52000	53000	670000	680000	700000	700000		
Chromium	U	1.0U									10U	10U	10U	10U	10U	10U		
Cobalt	U	1.1B						ļ			10U	10U	10U	10U	10U	10U		
Copper	U	4.0U	1.2U	1.2U	1.2U	1.2U	1.2U	5	1.2U	1.2U	170	14	10U	10U	10U	10U		
Cyanide	U										10U	N/A	10UJ	N/A	10UJ	N/A		
Flouride	U					i										l l		
1ron	j j	10.0U	160	1,100	95	2,300	4,600	630,000J	180	41,000	140J	100UJ	7600J	7200J	5900J	6900J		
Lead	U	1.0U	14U	14U	14U	14U	14U	14U	14U	14U	5.4	3	6U	6U	6U	6∪		
Magnesium	1	5,750		•				1			9100	9400	86000	90000	81000	82000		
Manganese		2.38	0.5U	2,800	430	1,700	4,700	42,000	840	8,100	12	10U	1,000	1,000	1300	1300		
Mercury	0	0.20U	0.03U	0.03U	0.03U	0.03U	0.03U	0.03U	0.03U	0.03U	0.2U	0.2U	0.2U	0.2U	0.2U	0.2U		
Nickel	U	1.0U									20U	20U	20∪	20U	20U	20∪		
Potassium		4,680B						İ			1000U	1100	27000	29000	26000	26000		
Selenium	U	2.0U						l			5U	5U	5U	5U	5U	5U		
Silver		1.0U									10U	10U	10U	10U	10U	10U		
Sodium	7,600	2,250B						1			1200	1100	60000	62000	60000	59000		
Sulfate	61,000														4011			
Thallium	J U	2.0U									10U	10U	10U	10U	10U	10U		
Vanadium	1	1.0U					= 400 :				10U	10U	10U	10U	10U	10U		
Zinc		76.2	12J	64J	380J	73J	7,100J	4,700J	670J	220J	90	20U	87	87	41	42		

B - The associated numerical value was detected below the CRDL, but greater than the method detection limit and is therefore

J - The associated numerical value is an estimated quantity because the Quality Control criteria were not met

U - The analyte was not detected at reported concentration (qualified by laboratory software). -or- The material was analyzed for,

APPENDIX E RESPONSES TO EPA COMMENTS

Responses to EPA Comments¹

on

Initial Solids Removal Plan Submitted May 2, 2011

by

Atlantic Richfield Company

July 7, 2011

SOLIDS REMOVAL PLAN (SRP)

COMMENT: As was discussed during our meeting in Denver on May 10, several elements of the solids management operation are conceptual at this time, and we understand that the plan proposes to obtain additional information during 2011 in order to develop final designs. However, some information already exists that would be useful in this document to support the initial decision to allow placement of the drying facility on the calcine tailings. The physical and chemical properties of the calcine tailings should be provided in this document based on historical data collection. Specific plans to collect data that will answer these questions must be explained also. These data should address the questions as whether the tailings can support the drying facility and that the flow of leachate through the tailings will not degrade downgradient groundwater or surface water quality. Please address these comments and those that follow in the revised SRP.

RESPONSE: See additional discussion of a site geologic and groundwater model for the proposed interim drying facility in Section 3.2 and a discussion of the calcine tailings and proposed geochemical sampling and testing in Section 3.3 of the revised Initial Solids Removal Plan (ISRP) dated June 30, 2011.

COMMENT: The depiction in this draft plan of the water level relative to the bottom of the proposed drying cells raises concerns, and it is of interest and should be monitored. It is understood that the water level data shown was projected from wells not in the immediate area.

RESPONSE: See discussion of groundwater levels and conditions in Section 3.2 and Section 3.3 of the revised Initial Solids Removal Plan (ISRP) dated June 30, 2011.

¹ EPA Comments on Atlantic Richfield Submittals May 2, 2011: Sampling and Analysis Plan/Quality Assurance Project Plan/Solids Management Plan and Health and Safety Plan: transmitted via email from Steve Way/EPA to Chuck Stilwell/Atlantic Richfield on May 27, 2011 at 2:58 pm MDT.

COMMENT: Additionally, it is expected that details of the planned sampling and geotechnical analyses of the solids for purposes of design the repository and associated placement requirements will be forthcoming in a separate submittal.

RESPONSE: Comment noted and agreed to.

COMMENT: The plan submitted May 2, 2011 proposes to construct an "Interim Drying Facility" with multiple cells of varied design in a location above the water table to promote gravity drainage. An allowance for decanting water to the side of the cells is also included in case the gravity drainage concept is ineffective. The solids materials (mostly lime sludge precipitates) are estimated to have a permeability of around 1 x 10⁻⁵ cm/sec. hitially solids will be removed from pond 18 which has been subject to surface drying and some consolidation during dry seasons and by purposefully routing flow away from the pond to promote drying. The plan proposes that various methods of excavation and removal may be attempted including front end loader or low ground pressure long-stick excavators feeding haul trucks, and hydraulic suction dredges feeding pumped sludge pipeline system. The following comments are offered:

1. The proposed location of the drying cells above the existing water table is the most logical choice and is recommended to proceed to construction.

RESPONSE: Comment noted.

2. What is the detail for the run on control ditch? Will the ditch be lined or will the uphill side of the embankments be constructed from low permeability fill to minimize the infiltration of ditch flow seepage into the drying cells?

RESPONSE: The run-on control ditch/berm will be constructed of sufficiently low permeability soils and with adequate grade and freeboard to minimize surface water inflow or infiltration to the drying cells. The design of the system will be based on engineering judgment and the experience of the Atlantic Richfield design and construction oversight team.

3. Front end loaders are likely to be ineffective due to their limited reach and are liable to become stuck in the mud because of the high bearing pressure of the tires and are therefore not recommended for this work. Building earthen causeways or placing swamp mats is very time consuming and should be avoided if possible.

RESPONSE: Comment noted.

4. It is not understood why a two-feet-thick layer of solids must remain in pond 18 as a "liner." If this layer could be eliminated (allowing excavation to a firm foundation) than the need for a low ground pressure excavator could be eliminated in favor of a more conventional excavator. A long-stick is recommended as the greater reach is very useful in projects of this nature and provides for a safer working environment by keeping the

machine away from the active excavation face which is prone to break off and slide without warning.

RESPONSE: It is Atlantic Richfield's intention to maintain a nominal thickness of relatively low permeability settled solids in the bottoms, and to the extent practical, on the side slopes, of the ponds during removal of solids to retain the option of further analyzing the need for and effectiveness of these materials in reducing seepage of pond water to the underlying typically coarse-grained alluvial aquifer. The additional evaluation of the pond bottom design will be performed as part of the upcoming water treatment technology screening and design tasks.

5. An initial test of stacking the material should be made in pond 18. If it is possible to dig and stack the material, to say 4 to 8 feet high along the side of the pond and let it stand for a day or two, a significant initial dewatering may occur. This extra effort can reduce the volume hauled out of the pond and speed subsequent drying and handling operations. The strength of the material can be quickly judged in the field by seeing how high an excavator can pile it up until the pile has a slope failure.

RESPONSE: The suggested stacking of pond solids as described is judged not feasible based on prior experience at Rico and other Atlantic Richfield sites with similar lime-precipitated settled solids.

6. Drying in place in the cells is all that is proposed for the test and the material will be left in place over the winter. It is recommended that if drying in the cells is successful, further processing such as compaction in place or removal and compaction in one of the other cells be performed to take advantage of dry fall weather. Experience at several other similar projects has shown that the dry weather is a limiting factor to drying and consolidation and full advantage should always be taken of this seasonal benefit to reduce the material volume (even for a test operation).

RESPONSE: Consideration will be given to this suggestion based on the measured and monitored performance of the test cells as proposed in the ISRP. This information will be used as part of the geotechnical evaluation and design of the solids repository.

7. Wet sloppy material tends to slosh around and spill out of trucks. Consider the geometry of the haul truck beds before making a selection as some are better able to carry runny material.

RESPONSE: Comment noted.

8. No consideration of admixtures is included in the tests. Were they considered? We note the following results in dealing with sludge:

Admixture	Comments
Dry granular soil, gravel, or waste	Dry soil can absorb water and increase strength. It
rock.	has the disadvantage of significantly increasing
	disposal volume and requires an on-site borrow
	source to be cost effective as the additions are in
_	the 20 to 35% range.
Cement	Excellent in adsorbing water and improving
	strength of very weak material. Increases disposal
	volume slightly. Usually a few bench scale mixing
	tests are performed to determine the amount of
	cement addition.
Fly ash or lime	Absorbs water and improves strength, to be cost
-	effective a low-cost source would need to be
	identified.

RESPONSE: The decision as to whether or not to consider amendments will be based on the measured and monitored performance of the test cells as proposed in the **ISRP**.

9. Proposed drying cell 3 (placing runny material on a clean gravel without a filter is not recommended. The sludge is likely to migrate into the gravel and eventually clog it thus creafing a larger disposal volume. Consider instead performing a test using either a "dirty gravel" (one that meets filter criteria, or cover the gravel with a thin (8 or 10 oz) non-woven geotextile which has a fairly large opening size (AOS not smaller than 100).

RESPONSE: It is Atlantic Richfield's intention to construct drying cell 3 as described in the originally submitted ISRP in order to evaluate the nature and degree of intrusion of solids into a gravel drainage media, and the impact of that intrusion on the effectiveness of the gravel drain (even if partially clogged) to effectively convey pore water released by gravity drainage of the overlying treatment solids. The performance of this unfiltered cell will be compared with the performance of the similar but filtered drying cell 4.

10. It appears that pond 18 has denser and more consolidated material than some of the other ponds. The proposed cell placements should be targeted to the consistency of the specific material to be placed. Proposed cells 1 and 2 are only likely to be useful for sludge which can be loaded into trucks. For very watery material where dredging may be the only practical option for transport, the ponds with a designed bottom drain/filter are more appropriate. A few minutes of digging with an excavator and trying to load the material is a quick and easy way to judge if the sludge should be excavated and put into trucks or if it should be dredged. Where the volumes of material to be dredged are small, a super sucker truck has been more cost effective than a dredge feeding a pump and pipeline.

RESPONSE: Comment noted.

 11. Where feasible, excavation and truck hauling should be the favored handling method. Experience on several jobs has shown that this can be accomplished at lower costs (about 1/3 the cost per cubic yard of pumping) and in less time than a dredging, pumping, and drying operation.	
RESPONSE: Comment noted.	